

National Contact Point for Responsible Business Conduct Peer Reviews

Austria 2026



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Foreword

The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are recommendations addressed by governments to multinational enterprises operating in or from adhering countries. They provide non-binding principles and standards for responsible business conduct in a global context consistent with applicable laws and internationally recognised standards. The Guidelines are the only multilaterally agreed and comprehensive code of responsible business conduct that governments have committed to promoting.

Adhering governments to the Guidelines are required to set up a National Contact Point for Responsible Business Conduct (NCP) that operates in a manner that is visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the Guidelines. The 2023 update of the Guidelines reinforced peer reviews of NCPs by making them mandatory and periodic, subject to the Modalities for Peer Reviews of National Contact Points for Responsible Business Conduct, approved by the Working Party on Responsible Business Conduct (WPRBC).

The peer reviews are led by representatives of two other NCPs who assess the NCP under review and provide recommendations. The reviews give NCPs a mapping of their strengths and accomplishments, while also identifying opportunities for improvement, including a structured assessment of how the NCP addresses the core effectiveness criteria. More information can be found online at <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/national-contact-point-peer-reviews.html>.

This document is the peer review report of the NCP of Austria. This report was prepared by a peer review team made up of reviewers from the NCPs of Bulgaria and Spain. The NCP of Bulgaria was represented by Gabriela Georgieva and Iva Tsvetkova. The NCP of Spain was represented by Sergio Garcia Sotomayor. The OECD Centre for Responsible Business Conduct was represented by Nicolas Hachez and Bettina Braun. The report was informed by dialogue between the peer review team, the NCP of Austria and relevant stakeholders during an in-person mission on 17-19 November 2025. The peer review team wishes to acknowledge the NCP for the preparation of the peer review. This report also benefited from comments by delegates to the WPRBC and institutional stakeholders (BIAC, OECD Watch, TUAC). It was discussed by an informal review group of the WPRBC on 4 May 2026 and approved and declassified by the WPRBC on 3 June 2026.

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1 Key findings and recommendations

Institutional arrangements

The Austrian NCP has a single agency structure and is located in the Federal Ministry of Economy, Energy and Tourism. It is created as a distinct unit by Ministerial Decree and, in practice, takes decisions autonomously from the ministry hierarchy. The NCP is supported by a Steering Committee (LAUS), composed of representatives of federal ministries and agencies, stakeholder representatives, and experts, and is chaired by a representative of the Ministry of Economy, Energy and Tourism. The NCP does not have a separate legal basis and is subject to general Austrian administrative law, which can create challenges for the NCP in fulfilling its mandate in line with the Guidelines. These challenges include publishing statements in the specific instance process without consent of the parties as to their content, including initial assessments or recommendations, or sharing confidential case information with the non-governmental members of the LAUS.

Stakeholders generally praised the NCP staff and had a clear understanding of the structure of the NCP. Stakeholder views diverged on the location of the NCP: Some business and government stakeholders highlighted advantages such as the NCP benefitting from relevant expertise, access to ministry resources and the policymaking process. Others suggested that the NCP's location within the ministry and its structure as a single unit embedded in the ministry hierarchy may impede its perception of impartiality, particularly towards foreign stakeholders. The location has created proximity to policy-related positions taken by the ministry that were viewed as supporting one stakeholder group over another.

The LAUS is an important connection between the NCP and diverse stakeholders, and stakeholders noted that it is a relevant source of expertise for the NCP. It does however not counter-balance perceived impartialities due to the NCP's structure and location. Its role in practice is limited to an advisory function and some members noted they would prefer a more active role, commenting that it was difficult for them to perform some of their duties in practice, such as providing advice on specific instances without confidential case information. On the other hand, members did not always show active ownership in engaging with the NCP and advocating for it.

The NCP is comprised of one permanent full-time position, currently filled at 80% FTE, with occasional reinforcements by the department. This creates risks of capacity gaps and potential discontinuity. It also risks safeguards offered through the distinct unit set-up, as occasional staff may have other departmental tasks and are integrated in ministry hierarchy. The majority of stakeholders indicated that they do not consider the financial and human resources to be sufficient and several suggested that the resources be increased. The NCP has a two-year budget specifically dedicated for promotional activities, which provides planning security, and has enabled the NCP to increase its promotional activities.

Table 1. Findings and Recommendations – Institutional Arrangements

	Finding	Recommendation
1.1	The NCP does not have a specific legal basis and operates under	Austria should create a clearer legal basis for the NCP, or

	Finding	Recommendation
	general administrative law. In Austria, this can have limitations on the implementation of the NCP's mandate in alignment with the Guidelines, such as providing a predictable status to the non-government members of the steering committee, or performing some actions in specific instances, such as publishing statements with the NCP's own evaluation including recommendations or sharing case information with the steering committee members.	otherwise obtain legal guarantees to ensure that the NCP can fulfil the entirety of its mandate in alignment with the Guidelines.
1.2	The structure of the NCP as a single unit located in the Ministry of Economy creates issues with perception of impartiality for several reasons: - While the NCP in practice does not receive instructions when handling specific instances, this is not formalised or visible to external stakeholders, which view the NCP as fully embedded into the hierarchy of the ministry. - It creates proximity to policy decisions that are politically charged. - The steering committee is not perceived as a sufficient impartiality safeguard, because it has a limited advisory role and is chaired by a representative of the Ministry of Economy.	Austria should find ways to improve the perception of impartiality of the NCP, drawing on experience from the NCP Network, such as by: - Formalising the removal of the NCP from the hierarchy on substantive decisions in the specific instance process, for instance in a new legal basis, and communicating this actively to external stakeholders. - Making decision making in specific instances more collegial between ministries to reduce the perception that decisions are taken out of the Ministry of Economy alone. - Ensuring that the role, composition and operation of the LAUS reinforces the NCP's perception of impartiality (see rec. 1.3).
1.3	The opportunities represented by the steering committee could be better leveraged. - On the one hand, some members feel a divergence between what the steering committee was set out to do, notably as specified in the terms of reference, and what they in practice are able to do (such advising on specific instances). - On the other hand, there could be more active ownership and involvement of members in engaging with the NCP and advocating for the NCP within their organisation and stakeholder groups. For example, there was no input on the update of the rules of procedure.	The NCP and steering committee should collaboratively revisit the terms of reference of the steering committee to come to a shared understanding of their respective roles and ensure a firm commitment to implementing the NCP responsibilities.
1.4	The staff resources of the NCP consist of only one person. Reinforcements are occasionally provided by the RBC department. This structure carries the risk that, in the event of staff turnover, the NCP may not have sufficient resources to meet its mandate.	The ministry should consider increasing the NCP staff resources.

Promotional activities

The NCP has co-organised and participated in numerous promotional events in recent years. In 2024, it organised 11 events and participated in four. Similarly, in 2023 it organised ten events and participated in five and in 2022 it organised eight events and participated in one. The events the NCP organises regularly fall into four types of events: Webinars, multi-stakeholder forums, roundtable discussions with employee representatives, and civil society dialogues. The events allow for a sharing of interesting practices and bring together diverse perspectives and speakers. Stakeholders highly praised the events the NCP organises, noting they bring together various stakeholder groups, foster constructive discussion and provide concrete, practical insights. A civil society stakeholder noted the NCP is well known in specialist circles and suggested the NCP could further increase its reach by mapping potential new stakeholders.

The NCP has a two-year promotional plan with corresponding resources, which allows it to plan ahead. As a result, the visibility of the NCP and the Guidelines has increased in the last few years. This is excellent practice and should be continued. The NCP receives support through a private-sector organisation, which, under the supervision of the NCP, supports with organisational aspects of promotional events. The NCP participates in the German-speaking (DACH) regional NCP network (Austria, Germany, Switzerland), through which the NCPs have developed joint informational material and organised webinars together. The website is comprehensive and available in English and German, which are largely aligned. Stakeholders noted that the website could increase visibility and reach by being a standalone website.

Table 2. Findings and Recommendations – Promotional Activities

	Finding	Recommendation
2.1	The NCP through strategic engagement in different formats has achieved visibility with a group of specialised actors and stakeholders, who regularly attend events.	As a next step, the NCP should consider strategies to reach outside of its existing networks of stakeholders committed to RBC, for instance through a stakeholder mapping.

Specific instances

After a period of inactivity, the case load has increased in recent years. This is a good signal for trust and visibility of the process. As of the date of the on-site visit, the NCP had received ten specific instances in total (seven since 2011 and five in the last five years). Of those ten specific instances, five have been concluded by the NCP, one was closed without a statement in 2004, one was not accepted and three were ongoing. Of the five concluded cases, three led to an agreement. The NCP updated its case-handling procedures in 2024, providing for a generally predictable and equitable process.

The NCP staff is viewed as very professional, knowledgeable and helpful in handling specific instances. In the last five years, the NCP published one final statement, which did not contain recommendations. The NCP considers it is limited in providing its own assessments, including recommendations, in published statements, particularly if parties do not engage (see also above Table 1). The NCP has not been able to keep within indicative timeframes, which diminishes predictability and the value of the process for some submitters. In some cases, this was due to lack of staff and very formal working methods under which the NCP does not publish statements without both parties agreeing with it.

Table 3. Findings and Recommendations – Specific Instances

	Finding	Recommendation
3.1	The NCP has provided limited analysis and recommendations in final statements. The NCP considers it is limited in providing its own assessments, particularly where parties do not willingly engage in the process.	The NCP should use its expertise to assist with resolving issues raised in specific instances through detailed statements, containing analyses of the issues and recommendations, in accordance with the Guidelines.
3.2	The NCP has not been able to keep within indicative timeframes, which diminishes predictability and the value of the process for some submitters. While not always due to the NCP, in some cases this was due to lack of staff and very formal working methods.	The NCP should seek ways to keep within the timelines as much as possible, for instance by shortening the initial assessment process.

Support to policy

The location of the NCP within the Ministry of Economy positions it well to support on RBC related policy. NCP staff are for example involved to varying degrees in the negotiation and transposition processes of EU legislations related to RBC. During the negotiations of the European Union's Corporate Sustainability Due Diligence Directive (CSDDD), NCP staff helped develop Austria's position, including through the organisation of stakeholder roundtables. The NCP participates in the Universal Periodic Review of the UN Human Rights Council. It actively engages with other agencies and ministries, such as the interministerial co-ordination group on the 2030 Agenda, and assists the export credit agency and the Austrian development bank with expertise where relevant. Stakeholders appreciated the NCP's engagement, particularly in relation to the CSDDD process.

Table 4. Findings and Recommendations – Support for government policies to promote RBC

	Finding	Recommendation
4.1	The NCP, or its staff in other capacities, is connected to the main ministries and agencies related to RBC. Its level of involvement varies by ministry and issue, ranging from active engagement to a consultative or informational role.	The NCP should continue its engagement with the policy community to seek ways to promote a more complete alignment of Austrian policies with the Guidelines.

2 Structured assessment of core effectiveness criteria

As provided for in the modalities for peer reviews of NCPs, the following table provides a structured assessment of the extent to which the NCP under review achieves the core effectiveness criteria as set out in the Implementation Procedures of the Guidelines. The findings in the table work to inform the report's recommendations and provide an overview of the NCP's functioning and areas for improvement.

	Visibility	Accessibility	Transparency	Accountability	Impartiality and equitability	Predictability	Compatibility
Institutional arrangements	The NCP is a distinct Unit in the Ministry of Economy. It is not formally constituted, which reduces its visibility and may affect the perception of impartiality.	Different stakeholder groups are represented in the NCP's advisory body. Opportunities through the LAUS for expertise input or connection stakeholders could be better leveraged.	The NCPs case-handling framework is available on its website in English and German. The NCP has no formal mandate or legal basis, which reduces transparency of operations.	The NCP reports annually to the OECD and makes the reports publicly available on its website.	Decision making is done by one unit which can impede perceived impartiality. Decision making in practice is insulated from influence of hierarchy, but this is not formalised. The LAUS is not seen as a counter-balance.	The NCP has clear operating and decision making procedures.	The NCP has only one dedicated staff position which is not always sufficient. The NCP does not have a legal basis, which creates some challenges for the NCP's fulfilment of its responsibilities in accordance with the Guidelines.
Promotion	The NCP reaches a critical mass of stakeholders through its promotional activities. The NCP could be more visible to potential submitters.	Promotional materials and events are free and accessible on the website.	The NCP has a two-year promotional plan, available on the website in German.	The NCP assesses the impact of its promotional events through feedback forms.	The NCP targets all stakeholder groups with stakeholder specific events as well as with a multi-stakeholder forum and promotional material accessible to all stakeholders.	The NCP announces in advance its promotional activities and has a promotional plan.	The NCP's promotion meets specifications of the Procedures.
Specific instances	The NCP's case-handling function is known among lead stakeholders.	The NCP's rules of procedure and guidance do not set onerous filing requirements.	The NCP publishes its statements on its website.	The NCP is actively engaged with parties throughout the process.	The NCP staff is perceived as impartial and equitable in the handling of specific instances.	The NCP usually does not meet indicative timelines.	NCP case-handling procedures are consistent with the Guidelines. Statements could contain more NCP evaluation and recommendations.
Conclusion	strengthen	strengthen	maintain	maintain	strengthen	maintain	prioritise

Note: Light grey boxes correspond to areas where the NCP should maintain practice, medium grey boxes correspond to areas where the NCP should strengthen practice, and dark grey boxes correspond to areas where the NCP should prioritise improvements to current practice.

3 Introduction

The Austrian NCP at a glance

Established: 2000

Structure: Single agency with a steering committee

Location: Federal Ministry of Economy, Energy and Tourism in the Directorate-General for European Union and International Market Strategies

Staffing: One part-time (80%)

Webpage: <https://www.bmwet.gv.at/en/Topics/International/Austrian-National-Contact-Point-for-Responsible-Business-Conduct.html> (English), <https://www.bmwet.gv.at/Themen/International/OECD-Leitsaetze-multinationale-Unternehmen-OeNKP.html> (German)

Specific instances: 10, including 5 concluded, 1 not accepted, 1 ongoing and 3 pending

The Implementation Procedures of the Guidelines require NCPs to operate in a manner that is visible, accessible, transparent, accountable, impartial and equitable, predictable, and compatible with the Guidelines. This report assesses conformity of the Austrian NCP with the core effectiveness criteria of NCPs and with the Implementation Procedures.

Austria adhered to the OECD Declaration on International Investment and Multinational Enterprises (Investment Declaration) in 1976. The OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the Guidelines) are part of the Investment Declaration. The Guidelines are recommendations on responsible business conduct (RBC) addressed by governments to multinational enterprises operating in or from Adherents. The Guidelines have been updated six times since 1976; the most recent revision took place in 2023.

Countries that adhere to the Investment Declaration are required to establish National Contact Points for Responsible Business Conduct (NCPs). NCPs are agencies established by adhering governments to “further the effectiveness of the Guidelines” (OECD, 2023^[1]). The OECD Council Decision on the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct [OECD/LEGAL/0307] (the Decision) states that “NCPs shall have the following responsibilities:

1. Promote awareness and uptake of the Guidelines, including by responding to enquiries;
2. Contribute to the resolution of issues that arise in relation to the implementation of the Guidelines in specific instances.

In addition, where appropriate and in co-ordination with relevant government agencies, NCPs may also provide support to efforts by their government to develop, implement, and foster coherence of policies to promote responsible business conduct” [OECD/LEGAL/0307].

Adherents are required to make human and financial resources available to their NCPs so they can effectively fulfil their responsibilities in a way that fully meets the core effectiveness criteria, taking into account internal budget capacity and practices [OECD/LEGAL/0307, Decision, I.4].

The Procedures attached to the Decision cover the role and functions of NCPs in six parts: institutional arrangements, information and promotion, specific instances, support for government efforts to promote responsible business conduct, reporting, and peer reviews.

From 2009-2024, NCPs underwent voluntary peer reviews. The methodology for the peer review was the OECD Core Template for Voluntary Peer Reviews of NCPs (OECD, 2021^[2]). In 2017, at the OECD Ministerial Council Meeting (MCM), ministers committed “to having fully functioning and adequately resourced National Contact Points, and to undertake a peer learning, capacity building exercise or a peer review by 2021, with the aim of having all countries peer reviewed by 2023.” (OECD, 2017^[3]). In 2023, the Procedures were updated. In particular, a new part on peer reviews was added providing for periodic mandatory peer reviews of NCPs. Mandatory peer reviews follow a cycle of seven years, with each NCP set to undergo a peer review in each cycle, starting in 2025. “Modalities for Peer Reviews of National Contact Points for Responsible Business Conduct” (the Modalities) for these peer reviews were adopted in November 2024 (OECD, 2025^[4]).

The objectives of peer reviews as set out in the Modalities and the Commentary (para. 23) are to evaluate the strengths and weaknesses of the NCP in accordance with its responsibilities and the core effectiveness criteria set out in the Procedures; and to make recommendations for improvement.

The peer review of the NCP was conducted by a peer review team made up of reviewers from the NCPs of Bulgaria and Spain, along with representatives of the OECD Secretariat. The peer review included an on-site visit which took place on 17 – 19 November 2025. The information in this report is current as of 19 November 2025. This visit included interviews with the NCP, other relevant government representatives and stakeholders. A list of organisations that participated in the on-site visit is set out in Annex B.

This report was prepared based on information provided by the NCP and in particular, its responses to the NCP questionnaire set out in the Modalities for Peer Reviews as well as responses to requests for additional information. The report also draws on responses to the stakeholder questionnaire and NCP Network questionnaire, which were completed by 26 organisations representing business, civil society, government and trade unions, and five other NCPs, respectively (see Annex A for a complete list of stakeholders who submitted written feedback) and information provided during the on-site visit.

The peer review team wishes to acknowledge the NCP for the excellent preparation, documentation and discussions throughout the peer review, the open exchanges at the on-site visit, and its efforts to ensure participation from stakeholder groups through written contributions and during the on-site visit. The peer review team also welcomes the NCP’s efforts to facilitate a deep dive session with parties to a closed specific instance.

2019 peer review of the Austrian NCP

Austria undertook an NCP peer review in 2017 - 2018 under the system of voluntary peer reviews. The basis for the peer review was the 2011 version of the Guidelines and the methodology for the peer review was the 2015 version of the OECD Core Template for Voluntary Peer Reviews of NCPs (OECD, 2015^[5]). The peer review was conducted by a peer review team made up of reviewers from Germany, Finland, Sweden, and an observer from Poland, along with representatives from the Secretariat.

The on-site visit for the peer review took place on 14 – 15 December 2017. The report was published in 2019 (OECD, 2019^[6]).

At the time of this peer review, the NCP was a distinct unit in the Federal Ministry for Digital and Economic Affairs with one full-time staff member and a steering-committee. It had handled five specific instances.

The peer review report contained eight recommendations around three thematic areas addressed to the NCP, notably to:

- make available necessary human and financial resources to the NCP
- take measures to improve its perception of impartiality
- take measures to ensure equal representation of all stakeholder perspectives in the steering committee
- ensure the steering committee is characterised mainly as a consultative body
- strengthen dialogue with civil society and worker organisations and promote the NCP mechanism to NGOs
- explore organising a forum for stakeholder – government exchanges on RBC
- align, update, and clarify the case-handling framework
- engage technical experts and external mediators where needed.

Austria was invited to provide a report on follow-up to the recommendations to the WPRBC within one year following the presentation of the report, which they did in November 2019. Follow-up actions reported by the NCP included focussing on open dialogue and involving civil society and worker presentations in promotional activities to improve the perception of impartiality, revising the case-handling framework in consultation with the NCP's steering committee, planning a first multi-stakeholder forum on RBC in 2020, and engaging with mediation experts in a mediation academy hosted by the NCP and through the Austrian mediation confederation. The steering committee welcomed the recommendations of the peer reviewers in an official statement (Federal Ministry of Economy, Energy and Tourism, n.d.^[7]) and the NCP answered to a parliamentary inquiry asking about the status of implementation on recommendations (Parlament Österreich, n.d.^[8]).

Economic context

In 2024, Austria's gross domestic product (GDP) amounted to USD 695.46 billion at current prices in purchasing power parity (PPP) terms, while GDP per capita stood at USD 75 775 in current prices and PPP terms (OECD, n.d.^[9]). Real GDP growth in 2024 was -0.70%. The five largest sectoral contributors to GDP were:

- industry (except construction)
- wholesale and retail trade; repair of motor vehicles and motorcycles; transportation and storage; accommodation and food service activities
- public administration, defence, education, human health and social work activities
- manufacturing
- professional, scientific and technical activities; administrative and support service activities.

Regarding foreign direct investment (FDI), the inward stock of FDI, which represents the accumulated value of FDI in the Austrian economy over time, was USD 230 504.88 million in 2024, equivalent to 44.19% of its gross domestic product (GDP). The outward stock of FDI was USD 304 832.74 million in 2024, representing 58.44% of its GDP. In 2024, Austria's exports of goods were USD 201 387.77 million and exports of services were USD 96 636.50 million, while imports of goods were USD 194 875.82 million and imports of services were USD 90 543.02 million (IMF, n.d.^[10]).

The main investors in Austria are the Netherlands, Luxembourg, France, Germany and Switzerland, and the main destinations for outward investment from Austria are the Netherlands, the United States, Spain, Luxembourg and Germany (OECD, n.d.^[9]). The most important partner countries for exports of goods are Germany, the United States, Italy, Switzerland and the Slovak Republic while the most important source countries for imports of goods are Germany, Italy, the Netherlands, Czech Republic and Switzerland (IMF, n.d.^[10]). The most important partner countries for exports of services in 2024 were Germany, Switzerland, Italy, the Netherlands and the United States (Oesterreichische Nationalbank, n.d.^[11]). The most important partner countries for imports of services were Germany, Italy, the United States, the United Kingdom and Switzerland.

4 Institutional arrangements

Legal basis

Austria adhered to the OECD Investment Declaration in 1976. The Austrian NCP was first created to promote the Guidelines in 2000. Since 2012, it is organised as a separate unit through a ministerial decree in the form of the Organisational Chart of the Federal Ministry of Economy, Energy and Tourism, last amended in September 2025 (Federal Ministry of Economy, Energy and Tourism, 2025^[12]). There is no legal basis setting out the responsibilities of the NCP, which is set up and operates on the basis of general Austrian administrative law. As the NCP's responsibilities are *sui generis* and derive from the Guidelines, this strong anchoring in administrative law can create challenges for the effective fulfilment of its responsibilities by the NCP. This is notably the case when collaborating with its advisory body (LAUS, see below Advisory body), as the NCP is barred from sharing confidential case information with the non-governmental members of the LAUS, even though it is part of the mandate of the LAUS to advise on specific instances. Likewise, the NCP is barred from publishing statements in the specific instance process without the explicit consent of the parties as to the statements' content, which prevents the NCP from including its own evaluation of the issues in its statements (see below Specific instances).

In terms of operating rules, the NCP has Rules of Procedure of the Austrian National Contact Point (Rules of Procedure), a Guidance on Grievance Procedures before the Austrian NCP (Guidance) and Terms of Reference of the Steering Committee of the Austrian National Point for Responsible Business Conduct (Terms of Reference), all three of which were updated in 2024 to align with the 2023 version of the Guidelines and their Implementation Procedures.

NCP structure

The NCP has a single agency structure and is located as a separate unit in the Federal Ministry of Economy, Energy and Tourism in the Directorate-General for European Union and International Market Strategies. The NCP is established as a distinct unit within Department II/6, Sustainability and OECD. Before 2012, the tasks of the NCP were carried out by the Department for Export and Investment Policy. Following the 2011 update of the Guidelines, the NCP was separated from the Department for Export and Investment Policy and created as a separate unit to ensure impartiality.

The NCP is composed of one permanent full-time position, which is currently filled by a part-time senior expert at 80%. Because of the high workload, two more experts of the department II/6 Sustainability and OECD are currently and temporarily working at 50% each for the NCP on instruction. These two experts have previously worked for the NCP.¹ The function of the head of the NCP currently lies with the Head of the Department for Sustainability.

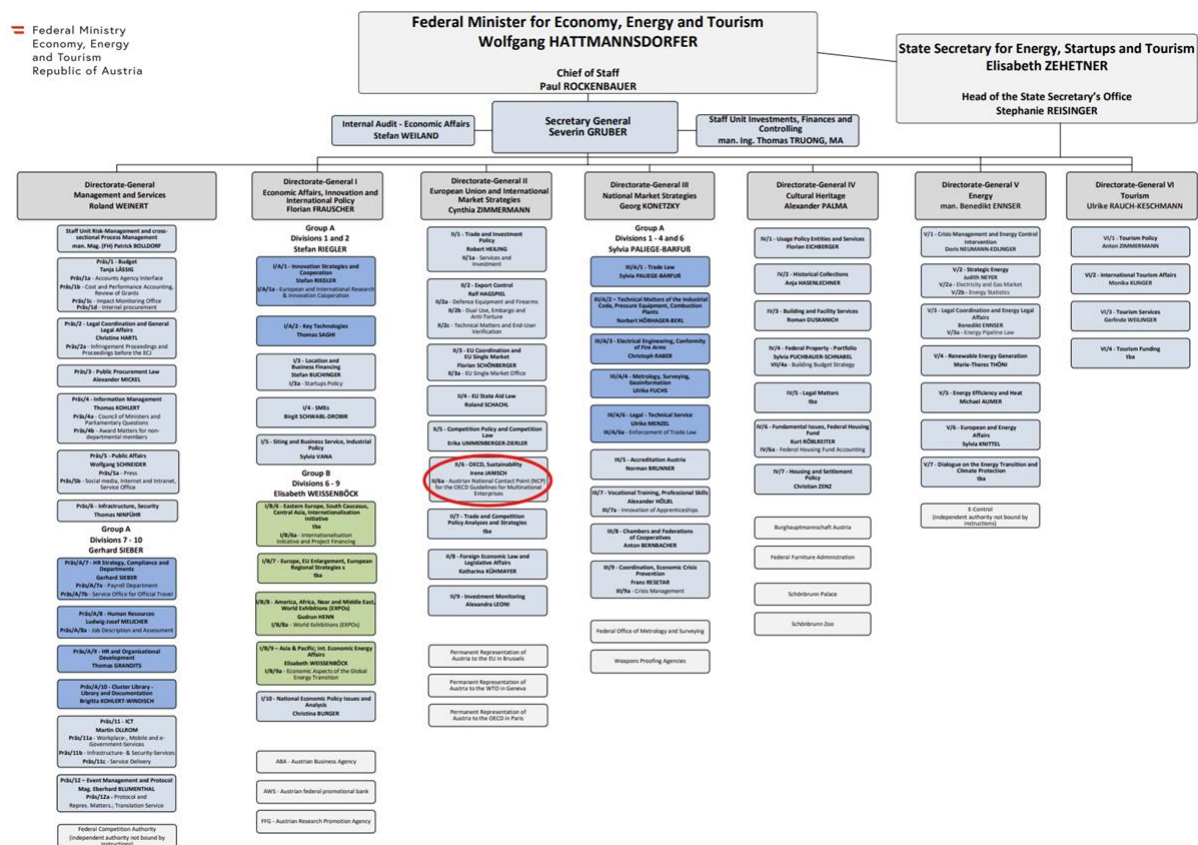
The NCP is supported by a Steering Committee (Lenkungsausschuss, LAUS) established in 2012 and extended in membership in 2024. The LAUS consists of representatives of federal ministries and agencies, as well as stakeholder representatives and experts.

Stakeholders had different perspectives on the location and structure of the NCP. Some stakeholders from business and government noted that the location in the Ministry of Economy allowed the NCP to benefit from relevant expertise, perceived it to act impartially and found it helpful to establish trust with companies. A civil society stakeholder noted it provided the NCP with access to ministry resources and policy processes. A government stakeholder pointed out that NCP staff, being part of the ministry, have a legal obligation to act impartially. A stakeholder from academia stated they did not, based on their practical experience, perceive the NCP's location to be an obstacle to its impartiality and that it was in the interest of Austria's economy that companies act in accordance with the Guidelines.

Other stakeholders from different backgrounds noted that, although they did not question the impartiality of NCP staff themselves, the NCP's structure and location in the Ministry of Economy could hinder the perception they have of the NCP's impartiality. Several stakeholders suggested the NCP should instead be organised as an independent structure. Civil society stakeholders in particular pointed out that the NCP is subject to the hierarchy of the ministry and cannot act independently. This was thought, for instance, to weaken the NCP's capacity to comment on relevant political developments, particularly since the Ministry's position in RBC-related regulatory processes was perceived by certain stakeholder groups as supporting business interests. One stakeholder stated that there was an inherent conflict of interest in the NCP's set up since the ministry's mission is to support business, conflicting with the NCP's responsibility to hold business accountable through specific instances.

This potential perception of a lack of impartiality is not counterbalanced by the existence of the LAUS (see below Advisory body), or by the fact that the NCP is set up as a distinct unit taking decisions autonomously from the ministry hierarchy. This is notably due to the fact that the distinct unit set up is not formalised legally (see below Functions and operations).

Figure 1. Organisational chart of the Federal Ministry of Economy, Energy and Tourism



October 2025

Note: The location of the NCP within the ministry is highlighted.

Source: Federal Ministry of Economy, Energy and Tourism (2025^[12]), Organisational structure, <https://www.bmwet.gv.at/en/Ministry/OrganisationalStructure.html>.

Functions and operations

The introduction to the Rules of Procedure recalls the NCP's two main responsibilities to "Promote the OECD Guidelines and their effective implementation" and "act as grievance mechanisms by contributing to the resolution of issues that arise in relation to the implementation of the Guidelines". Sections 4 - 6 of the Rules of Procedure provide further clarification on the missions of the NCP:

- Section 4 establishes that the NCP will promote the Guidelines and due diligence guidance documents "as widely as possible" including through "cooperation with stakeholders, social partners, civil society organisations and relevant government agencies". The NCP should provide materials and organise and participate in events, operate a website with information on the Guidelines, the specific instance process and reporting, as well as responding to inquiries.
- Section 5 provides detail on the NCP's function as a non-judicial grievance mechanism (see below Case-handling procedures).
- Section 6 details that the Austrian NCP supports the federal government in the "development, coherence and implementation of policies and programmes that promote responsible business conduct [...]", ensures that policies are aligned with OECD Guidelines and maintains the position of the Guidelines as recognised international standards.

The Head of the Department for Sustainability and OECD is currently, but temporarily and formally acting as the interim head of the NCP. The head of the NCP participates in the meetings of the LAUS without voting rights and takes notes at the meeting.

The mission of the advisory body is detailed in the Terms of Reference Section 7 and includes "advising the Austrian NCP on all matters relating to the implementation of the Guidelines, including the handling of complaints in specific instances", "supporting and advising the Austrian NCP in the implementation of the proactive agenda", participating in preparing the annual report to the OECD, promoting a broad dialogue on the Guidelines with stakeholders, making proposals for development of the NCP, suggesting consulting the OECD Investment Committee in case of doubts about the interpretation of the Guidelines, and evaluating the activities of the NCP in regards to compliance with the Rules of Procedure and key criteria of the Implementation Procedures of the OECD Guidelines.

All decisions are taken by the distinct unit, meaning the senior expert that is working for the NCP, autonomously and without intervention of the hierarchy. As civil servants, all NCP staff is bound by general administrative law, including laws and regulations providing for the impartiality, accountability and liability of members of the Austrian civil service. Decisions also need to be made in line with the Rules of Procedure and Terms of Reference. For advice, the NCP staff in practice seeks support from colleagues of the same department, from the Ministry of Foreign Affairs or the LAUS. As it is embedded into the ministry hierarchy, the NCP needs to report on its activities. In practice, the NCP does not receive instructions as to the substance of decisions when handling a specific instance. This practice is not reflected in a legal document, which diminishes its value in ensuring a perception of impartiality with stakeholders. To formalise its autonomy, the NCP indicated it would require a legal basis.

Stakeholders generally found the structure of the NCP to be clearly understandable and visible. Several stakeholders praised the expertise of the NCP staff on topics related to responsible business conduct.

Advisory body

The LAUS is the NCP's main channel for communication with stakeholders of the NCP. In bi-annual meetings of the LAUS, the NCP shares and discusses past and upcoming activities, provides summaries

of meetings of the OECD Working Party on Responsible Business Conduct and NCP Network, and updates on regulatory developments on RBC topics as well as on ongoing specific instances.

Composition

Fourteen institutions are represented in the LAUS through a member and a substitute member each, as well as two experts. A representative of the Federal Ministry of Economy, Energy and Tourism, Directorate General Economic Affairs acts as chair (Section 1 and 3), as shown in Table 5 below. The chair of the LAUS is from the same Directorate as the NCP, but in a different department.

Table 5. Members of the Steering Committee (LAUS)

Government members	Stakeholder representatives and experts
Federal Ministry of Economy, Energy and Tourism (chair)	Austrian Trade Union Federation
Federal Chancellery	Federation of Austrian Industries
Federal Ministry of Labour, Social Affairs, Healthcare and Consumer Protection	Representative of an Austrian member of OECD Watch representing civil society
Federal Ministry for European and International Affairs	Expert with knowledge of amicable extrajudicial dispute resolution, and
Federal Ministry of Finance	Expert with knowledge in the field of human rights (added in 2024).
Federal Ministry of Agriculture and Forestry, Climate and Environmental Protection, Regions and Water Management, administrative division for climate affairs (added in 2024)	
Federal Ministry of Agriculture and Forestry, Climate and Environmental Protection, Regions and Water Management, administrative division for forestry and agriculture (added in 2024)	
Federal Ministry of Justice (added in 2024)	
Federal Chamber of Labour	
Federal Chamber of Agriculture	
Federal Economic Chamber	

In response to a recommendation of the previous peer review, the membership was expanded by several ministries and an expert in human rights was added (see Table 5 above). Representatives of the relevant institutions as well as their substitutes are nominated by their respective institutions for two years (Section 2.1 Terms of Reference). The Federal Ministry of Economy, Energy and Tourism appoints the experts for extrajudicial dispute resolution and human rights. Some members criticised the appointment process of the human rights expert in 2022 in a letter, criticising that another candidate suggested by three members had not been properly considered and the appointment of the human rights expert was not transparently communicated. The chair of the LAUS noted that the appointment process for new experts in the future will include discussions in the LAUS.

Functions and operations

As per Section 4 of the Terms of Reference, the LAUS convenes twice a year in person, and where that is not possible, virtually. The chair or five members may request additional meetings. A provisional agenda and relevant documents are sent together with the meeting invitation. The head of the NCP attends the meetings in an advisory capacity without voting rights and takes minutes during the meeting. Other experts may be invited to the meeting as well. A duty of confidentiality applies to documents and information submitted or shared during meetings. The LAUS makes decisions on matters in its remit by consensus, or, if consensus is not possible, by a simple majority of votes cast (Section 8). Since 2018, the LAUS has not taken formal votes, except on its Terms of Reference.

Stakeholders generally considered the advisory body to be an important connection between the NCP and diverse stakeholders and a relevant source of expertise and perspectives for the NCP. The NCP consults the LAUS on its promotional plans and collaborates with the LAUS to identify relevant promotional topics and speakers. Though the LAUS was consulted when the NCP updated its rules of procedure and Guidance, the NCP did not receive any feedback. Members of the LAUS specifically praised collaboration between the NCP and LAUS in promotional activities and noted that they promote and distribute NCP events in their respective networks.

Members showed divergent understandings of their roles in LAUS, which has created different expectations and some frustration among members of the LAUS. While some members viewed their contribution as providing strategic expertise in an advisory manner, civil society and labour representatives stated their roles should be more active, steering NCP activity rather than just advising on it. The NCP explained that without a legal basis, it cannot share confidential case information with non-governmental members of the LAUS. Civil society and labour members noted that the information they did receive was not sufficient to enable them to fully meet the responsibilities associated with their role as set out in the Terms of Reference, which includes advising on specific instances. They also noted that they considered a more active involvement of the LAUS would be valuable to the process, the NCP and the parties. A government member on the other hand considered that the NCP found a good compromise on keeping the LAUS informed while honouring confidentiality arrangements, and business members pointed out that parties may have legitimate interests in not sharing confidential information with the LAUS. A civil society member stated that due to a lack of information on the specific instance process to the LAUS members, they and labour members did not feel encouraged to promote the specific instance process among their respective stakeholder groups.

Some members of the steering committee stated that the meetings enabled a good exchange of views, while one labour and civil society stakeholder suggested that meetings themselves could be restructured to allow for more exchange of views, noting that the focus of meetings now was on the chair sharing information. A government stakeholder recommended that the NCP also update on EU and national legislative developments relevant to RBC.

Due to disagreements as to the nature and extent of the advisory role and the fact that the chair of the LAUS is from the same ministry where the NCP is located, the LAUS is not perceived by civil society and trade union stakeholders as a counterbalance to potential perceived impartiality due to the location of the NCP.

Resources

The NCP is composed of one permanent full-time position, which is currently filled by a part-time senior expert at 80%. This set-up creates risks of capacity gaps and potential discontinuity in the event should that person leave the position. Because of the high workload, two more experts of the department II/6 Sustainability and OECD are currently and temporarily working at 50% each for the NCP on instruction. These two experts have previously worked for the NCP. As this additional supporting staff also handles other departmental tasks and remains within the broader hierarchy, this practice risks reducing the safeguards intended by the distinct unit set-up by introducing potential competing priorities or perceived influence. Other staff members within the Directorate General may support the NCP when needed in periods of high workload, for example the legal department on legal questions. However, the core NCP activity such as specific instance handling cannot be transferred to other Departments.

The resources the NCP has in practice have overall increased in the last years, though there have been fluctuations. During the time of the on-site visit of the last peer review in December 2017, the NCP had one full-time dedicated staff member. While the NCP reported one full time and one part-time position at 25% in 2019, the NCP operated with two part time staff at 50% and 25% respectively from 2020 – 2022.

A full-time staff member was added in 2023, and in 2024, the staff resources of the part-time positions were increased to 50% and 80%. It has been a challenge for the NCP to respond to an increase in workload through submissions of specific instances, which are unpredictable to the NCP.

The NCP takes several measures to preserve institutional knowledge and train new staff. The NCP keeps a record of all meetings and events, including sessions with parties in specific instances (in accordance with confidentiality and data protection frameworks), accessible to all NCP staff. Apart from NCP staff, the head and vice head of the department, other staff members who flexibly support the NCP in times of high workload, and members of the steering committee have knowledge of the work of the NCP. New staff members get a manual that includes information on the NCP, the LAUS, promotional activities, specific instances and activities at the OECD level. In addition, leaving staff members prepare and share information with colleagues as part of a structured handover process and may keep close contact with the NCP if they have taken over a different post in the same ministry. The head and vice-head of the department personally train new staff on the Guidelines, the NCP and RBC, and all civil service members must complete training programmes during their first years in service, including soft skills trainings such as in the fields of negotiation and mediation.

The NCP has a dedicated budget since 2019. In 2022 and 2024 each, the NCP received a two-year budget specifically for promotional activities, which provided planning security, enabling the NCP to increase its promotional activities.

The majority of stakeholders indicated that they do not consider the financial and human resources to be sufficient and several suggested that the resources be increased. While most stakeholders believe that the NCP has adequate access to expertise, one civil society stakeholder noted that the NCP has limited resources and expertise in mediation and fact-finding.

Reporting

The NCP reports annually to the OECD and makes the reports publicly available on its website dating back to 2012. It also reports on an ad hoc basis to inquiries from Parliament (Section 3.4 Rules of Procedure).² Anonymised minutes of meetings of the steering committee, including relevant decisions, are published on the NCP website, as well as statements of past and ongoing specific instances.

Stakeholders generally considered the reporting on the NCP's activities to be very clear and easily accessible on the website. One stakeholder observed that activities from 2025 were not yet reflected and suggested that more proactive communication by the NCP could help address this gap.

Table 6. Findings and recommendations – Institutional arrangements

	Finding	Recommendation
1.1	The NCP does not have a specific legal basis and operates under general administrative law. In Austria, this can have limitations on the implementation of the NCP's mandate in alignment with the Guidelines, such as providing a predictable status to the non-government members of the steering committee, or some actions in specific instances, such as publishing statements with the NCP's own evaluation including recommendations or sharing case information with the steering committee members.	Austria should create a clearer legal basis for the NCP, or otherwise ensure that the NCP can fulfil its mandate in alignment with the Guidelines, including making its own evaluations in statements, irrespective of consent of the parties.
1.2	The structure of the NCP as a single unit located in the Ministry of Economy creates issues with perception of impartiality for several reasons: All decisions are taken by one unit which is fully embedded into the hierarchy of the ministry. While the NCP in practice does not receive instructions when handling specific instances, this is not	Experience from the NCP Network can be useful in finding ways to improve the perception of impartiality. Removing the NCP from the hierarchy on substantive decisions in the specific instance process, for instance in a new legal basis, and communicating this to external stakeholders.

	Finding	Recommendation
	formalised or visible to external stakeholders. • It creates proximity to policy decisions that are politically charged. • The steering committee is not perceived as a counterbalance, because it has a limited advisory role and is chaired by a representative of the Ministry of Economy.	• Making decision making in specific instances more collegial between ministries.
1.3	The opportunities represented by the steering committee could be better leveraged. • On the one hand, some members feel a divergence between what the steering committee was set out to do, notably as specified in the terms of reference, and what they in practice are able to do (such as in the nomination of experts or advising on specific instances). • On the other hand, there could be more active ownership and involvement of members in engaging with the NCP and advocating for the NCP within their organisation and stakeholder groups. For example, there was no input on the update of the rules of procedure.	The NCP and steering committee should collaboratively revisit the terms of reference to come to a shared understanding of their respective roles and ensure a firm commitment to implementing the terms of references.
1.4	The staff resources of the NCP consist of only one person. Reinforcements are occasionally provided by the RBC department. This structure carries the risk that, in the event of staff turnover, the NCP may not have sufficient resources to meet its mandate.	The ministry should consider increasing the NCP staff resources.

5 Promotion

Promotional plan

Every year, the Austrian NCP adopts a promotional plan to raise awareness of the Guidelines. Based on the promotional plans from 2022 to the most recent one covering the years 2024 - 2026 they are generally structured around three areas:

Webinars and Dialogue Formats, including employee roundtables with the Chamber of Labour and the Austrian Trade Union Federation, civil society dialogues to discuss the NCP's work and explore joint projects, and the annual multi-stakeholder forum on corporate responsibility, providing a platform for relevant issues and stakeholder exchange.

Capacity Building of the NCP, including regular exchanges with other NCPs, particularly within the regional network of German-speaking NCPs, participation in peer-learning events, and engagement in meetings of the OECD NCP Network and various global OECD due diligence forums.

Joint Initiatives with relevant stakeholders, which includes providing expert input on the OECD Guidelines and Due Diligence Guidance, exploring joint activities to raise awareness and promote effective implementation. The NCP attached a provisional timetable for these initiatives.

The 2022 promotional plan focussed on promoting Human Rights Due Diligence, particularly among SMEs, and providing information to civil society and labour and trade unions. The 2023 plan and the most recent promotional plan covering the period from 2024 to 2026 focus especially on promoting due diligence in sensitive sectors such as finance, agriculture and textiles. They also emphasise conducting due diligence along the value chain. The 2024 - 2026 plan is available on the website and reflects stakeholder feedback who requested its publication to increase transparency (Federal Ministry of Labour and Economy, 2025^[13]). There are no indicators included to monitor the impact of the promotional plan.

The NCP itself does not measure awareness of the Guidelines and the OECD RBC Guidance by enterprises. However, the Department of Trade, Competition Policy, Analysis and Strategies in the Federal Ministry of Economic Affairs, Energy and Tourism has tendered studies related to RBC and the OECD Guidelines. In 2022, a study found that the UN Guiding Principles on Business and Human Rights and the UN Sustainable Development Goals are the predominantly used RBC instruments by enterprises in Austria (Meyer and Reinstaller, 2022^[14]).

Overall, the promotional work of the NCP was highly praised, notably as business and government stakeholders considered the NCP to be very visible. Trade union stakeholders specifically highlighted that the Guidelines have become better known and that the NCP positively contributed to this development. Civil society stakeholders noted the NCP was well known in specialist circles and could now focus outreach on non-specialist circles. They specifically suggested mapping stakeholders the NCP has already reached through its promotional efforts, and mapping potentially new stakeholders, including possible submitter organisations like the Klagsverband.³ A civil society stakeholder noted that the NCP could increase the promotion of its role as a grievance mechanism and suggested that the NCP develop a clearer understanding of potential users of the mechanism and expand its promotion to possible rightsholders or

affected communities. A stakeholder noted that the NCP is a key voice on responsible business conduct and international standards, which will be particularly important in future developments.

Information and promotional materials

The Austrian NCP has produced four detailed promotional brochures specifically designed to support companies trying to implement the Guidelines. The brochures are available in German (see Box 1).

Box 1. Information brochures developed by the NCP

In 2025, the Austrian NCP, in co-operation with the German and Swiss NCPs, published a 24-page brochure summarising the key contents of the **2024 OECD/FAO Business Handbook on Deforestation and Due Diligence in Agricultural Supply Chains** (Federal Ministry of Economy, Energy and Tourism, 2025^[15]). This brochure serves as a practical guide to implementing the Guidelines in the agricultural sector for companies of any size. It contains additional guidance for SMEs.

In 2024, the Austrian NCP published a comprehensive 30-page brochure on the **2023 update of the Guidelines** (Federal Ministry of Economy, Energy and Tourism, 2024^[16]). It details the most important changes organised according to the chapters of the Guidelines, includes a detailed Q&A on the 2023 update and explains why the Guidelines have been updated and that they remain voluntary and compatible with other international instruments.

In 2022, the Austrian NCP published a 35-page brochure focussing specifically on the **human rights chapter of the Guidelines** (Federal Ministry of Labour and Economy, 2022^[17]). The brochure explains human rights and the surrounding legal framework, as well as the relationship between business and human rights. It provides an overview of different examples of states incorporating business and human rights into their national legal frameworks and outlines the process of conducting human rights due diligence, including practical implementation guidance.

In 2021, the Austrian NCP published a 15-page brochure containing **practical guidance for companies** on conducting due diligence (Federal Ministry for Digital and Economic Affairs, 2021^[18]). It introduces due diligence, describing its characteristics and the benefits it can bring to companies. It then provides practical advice on how to implement the six steps of due diligence outlined in the Guidelines.

Source: Federal Ministry of Economy, Energy and Tourism (n.d.^[19]), Activities and Information Formats of the Austrian National Contact Point (NCP), <https://www.bmwet.gv.at/en/Topics/International/Austrian-National-Contact-Point-for-Responsible-Business-Conduct/Activities-and-Information-Formats-of-the-Austrian-National-Contact-Point-%28NCP%29.html>.

Stakeholders generally found the materials clear, useful, and easily accessible. Business stakeholders especially praised the Brochure on the human rights chapter of the Guidelines, stating they had used it when setting up due diligence processes. Another business stakeholder noted that through a proactive outreach of the NCP including through newsletters and invitations to events and its website, the NCP was well known among business stakeholders. One business stakeholder suggested shorter promotional materials and more guidance tailored for smaller enterprises.

Promotional events

The NCP has co-organised and participated in numerous promotional events in recent years. In 2024, it organised 11 events and participated in four. Similarly, in 2023 it organised ten events and participated in five and in 2022 organised eight events and participated in one (see Annex C for an overview of events the NCP organised and participated in from 2020 - 2024).

The NCP has outsourced organisational aspects of its promotional work to ICEP, an independent development co-operation with a market-oriented focus.⁴ ICEP has strong links with relevant companies and stakeholders, as well as practical expertise including technical expertise in the organisation of events and webinars, enabling it to support the NCP's promotional work effectively. Under the supervision of the NCP, ICEP supports the NCP with aspects such as co-ordinating speakers for events or providing software for webinars. The NCP remains responsible for all content. Additionally, the NCP gets support in organising events from the ministry's department for event management.

The events the NCP organises regularly fall into four types of events:

- webinars
- multi-stakeholder forums
- roundtable discussions with employee representatives
- civil society dialogues.

The NCP organises or co-organises multiple webinars each year which cover specific subjects related to the implementation of due diligence standards, such as engagement with local communities for businesses operating abroad, due diligence standards for climate protection, and due diligence in critical sectors. Many of the webinars are recorded and available on the website (see Figure 2).

Figure 2. Webinar organised by the NCP: Due Diligence in the Textile sector, 22 May 2024



Source: Federal Ministry of Economy, Energy and Tourism (2024^[20]), öNKP-Webinar: "Umsetzung von Sorgfaltspflichten im Textilsektor" vom 22. Mai 2024, https://www.youtube.com/watch?v=fcUe8gqbP_4.

The Austrian NCP also organises an annual multi-stakeholder forum, providing a platform for stakeholders to discuss current RBC topics and developments. The NCP also organises roundtable discussions with employee representatives from the Chamber of Labour and the Austrian Trade Union Federation to discuss relevant issues. Twice a year, the NCP hosts a dialogue with civil society stakeholders to discuss its work, explore joint projects, and provide civil society organisations with an opportunity to raise any challenges or concerns.

Several stakeholders highly praised the events organised by the NCP. Business and trade union stakeholders lauded that the NCP brings together various stakeholders, fosters constructive discussion between them and facilitates well-rounded dialogues. An academic stakeholder praised that events create room for discussion and different perspectives, including criticism. Stakeholders generally reported that webinars and in-person events were well organised and of good quality and a source of continuous learning since webinars remained available on the website. Stakeholders also appreciated that members from abroad, including the Global South, participated in some events, contributing valuable perspectives. Business and trade union stakeholders praise that webinars and roundtable discussions gave concrete and practical insights, with business stakeholders highlighting that SME stakeholders also attend the webinars. Stakeholders also praised the collaborative process for identifying relevant topics.

One stakeholder suggested exploring additional formats, such as peer-learning sessions or deep-dive workshops. Civil society and trade union stakeholders expressed interest in events being more targeted towards their interests and in having greater opportunities for involvement. One business stakeholder specifically requested more sector-focussed events, the financial sector specifically. Civil society stakeholders questioned the efficiency of outsourcing event organisation.

Webpage

The NCP has a dedicated webpage on the website of the Federal Ministry of Economy, Energy and Tourism, available in both German (Federal Ministry of Economy, Energy and Tourism, n.d.^[7]) and English (Federal Ministry of Economy, Energy and Tourism, n.d.^[21]). The website provides information on the NCP, the OECD Guidelines, and the grievance mechanism. Information on the English and German webpage is largely aligned, with some exceptions. While promotional events are reported on the German-language webpage, they are not prominently featured on the English-language version.

The website of the NCP is regularly updated. The updates do not only focus on recent events, but also on user-friendliness. The website is designed to work on all relevant devices (PC, mobile). The website's landing page features different sections, as well as subpages. It is available in German and English which are aligned, apart from information about events, as they are in German.

The landing pages include the following:

- A section providing an **overview** of the role of the NCP and an introduction to the Guidelines.
- A section on the functions of the Austrian NCP outlining its role in **promoting the OECD Guidelines**, providing information materials, organising and participating in relevant events, responding to enquiries, and supporting government efforts to ensure policy coherence on RBC. The section also includes a link to a webpage containing a description of Austrian NCP's events and promotional materials, which is available only in German.
- A section on the Austrian NCP's role as **grievance mechanism**. The German version includes a link to another subpage with more details on the grievance mechanism.
- A section on **organisation of the NCP** and its position within the Austrian Government, with a link to the rules of procedure in both English and German.

- A section on the **steering committee**, outlining its composition and tasks. The English webpage provides a link to the rules of procedure of the steering committee in German. The German webpage includes links to the steering committee meeting notes.
- A section outlining the seven **core effectiveness criteria** of NCPs.
- A section including links to all the **annual reports** submitted to the OECD, which are available in English.
- The German landing page includes a section on **peer reviews**, outlining their procedure and objectives. It summarises Austria's voluntary peer review in 2017, linking a steering committee statement, a related parliamentary question, and the peer-review report in English. It also notes the upcoming peer review in 2025.
- A list of available **downloads** in English and German, including the Guidelines, a complaint template (also available in French), guidance on grievance procedures, and the rules of procedure of the Austrian NCP.

The webpages include the following subpages:

- A subpage outlining **the content and chapters of the OECD Guidelines**, including a link to a German flyer summarising the Guidelines; introducing due diligence, with links to the RBC Guidance, as well ten cross-sectoral and sector-specific due diligence guidance documents, published by the OECD in German.⁵ In addition, it provides an overview of the OECD Recommendation on the Role of Government in Promoting RBC, including a link to a German translation of the 2022 OECD Recommendation on the Role of Government in Promoting Responsible Business Conduct (OECD, 2023^[22]).
- A subpage outlining **the NCP's events** and explaining their purpose in promoting the Guidelines. The subpage includes the NCP's promotional plan for 2024-2026, links to the aforementioned promotional materials, and studies by the ministry related to supply chains and corporate responsibility.
- A subpage with FAQs regarding the **specific instance procedure**, current and former specific instances handled by the NCP, as well as a link to the NCP cases database.

The NCP has consistently reported using social media for promotional purposes. The NCP uses the LinkedIn channel and Facebook page of the Ministry of Economy, Energy and Tourism to announce upcoming events and provide information on new promotional material and resources (see Figure 3). The ministry's Facebook page has around 26.000 followers and the LinkedIn channel 24 000 followers (Federal Ministry of Economy, Energy and Tourism, n.d.^[23]).

Figure 3. Facebook post 2024 Multi-Stakeholder Forum



Source: Federal Ministry of Economy, Energy and Tourism (2024_[20]), https://www.youtube.com/watch?v=fcUe8qqbP_4.

Stakeholders generally reported that the website is professional and easy to access. Some stakeholders recommended creating a stand-alone NCP website, separate from the ministry. A trade union stakeholder noted that such a visual separation from the ministry website might also increase the perception of impartiality. One government stakeholder noting that the government website comes with certain restrictions. A civil society stakeholder reported that the webpage is not regularly updated and that both language version could be made coherent.

Responding to enquiries

The NCP has its contact details listed on the webpage (address, email, fax and telephone). It also makes available a complaint template for submitting a specific instance.

Co-operation amongst NCPs

The NCP regularly engages in peer relearning activities. In October 2024, the NCP hosted a peer-learning event at the Federal Ministry of Labour and Economy in Vienna (see Figure 4). The event brought together representatives from 18 NCPs, with the objective of facilitating peer exchange on various issues and challenges encountered by NCPs in their work on promoting the guidelines, supporting policy coherence and handling specific instances. In 2019, the NCP organised a mediation academy in Vienna together with the Consensus Building Institute, which was attended by 16 professionals from 11 NCPs. The workshop addressed topics such as getting parties to the table, conducting initial assessments and preparing for face-to-face mediation, serving as an opportunity for NCPs to share common challenges and best practices. The NCP also participated in peer-learning events organised by other NCPs in 2020, 2021 and 2023.

Figure 4. Peer learning event organised by the NCP

Event organised in Vienna on 22 October 2024



Source: OECD (2025^[24]), *National Contact Points for Responsible Business Conduct in a changing landscape*, <https://www.oecd.org/content/dam/oecd/en/networks/national-contact-points/OECD-2024-Annual-Report-on-NCP-Activity.pdf>.

The NCP participates in periodic meetings of the German-speaking (DACH) regional network (Germany, Austria and Switzerland), which serves as a platform for exchange and co-operation among the three NCPs. The DACH network meets once a year in person and has virtual meetings and calls throughout the year. The exchanges between the NCPs cover various aspects of the NCP's work, including challenges in current cases, lessons learned, and the promotion of responsible business conduct. The three NCPs of the DACH network have developed joint information materials in German and organised webinars together including "Engagement with the local population during companies' activities abroad" and "Corporate due diligence: good practices and the role of auditing and compliance assessment bodies".

Other NCPs praised the NCP's engagement in peer learning activities, both in the DACH network and outside of it. Several NCPs particularly appreciated the 2024 peer learning event, indicating that it was very well organised, provided a good platform for exchanging experiences through concrete examples, helped form connections between NCPs and their peers, and that the NCP was hospitable. DACH-NCPs also noted that the NCP is very knowledgeable about the Guidelines and quick to provide helpful feedback to any enquiries. They also appreciated the work the NCP does in organising webinars, including through providing technical support through a contracting partner.

In 2022, the Austrian NCP was part of the peer review team for the Slovenian NCP.

Table 7. Findings and recommendations – Promotional activity

	Finding	Recommendation
2.1	The NCP through strategic engagement in different formats has achieved visibility with a group of specialised actors and stakeholders, who regularly attend events.	As a next step, the NCP should consider strategies to reach outside its bubble, for instance through a stakeholder mapping.

6 Specific instances

Terminology for the status of specific instances

Specific instances **concluded** are those that the NCP found to merit further examination after the initial assessment and that have subsequently been closed. For such specific instances, the NCP will have offered its “good offices” (e.g. mediation/conciliation) to both parties.

Specific instances **not accepted** are those that the NCP found not to merit further examination, or cases that have been withdrawn prior to the completion of the initial assessment and that have therefore been closed.

Specific instances **closed** include both specific instances that have been concluded and those that were not accepted.

Specific instances that are **ongoing** are those that are not yet closed. These include submissions received by the NCP, both those awaiting initial assessment, as well as those accepted by the NCP.

Source: OECD (2025^[24]), National Contact Points for Responsible Business Conduct in a changing landscape: 2024 Annual Report on NCP Activity, https://www.oecd.org/content/dam/oecd/en/networks/national-contact-points/OECD-2024-Annual-Report-on-NCP-Activity.pdf/jcr_content/renditions/original/OECD-2024-Annual-Report-on-NCP-Activity.pdf.

Overview

As of the date of the on-site visit, the NCP had received ten specific instances in total (seven since 2011 and five in the last five years).

Of those ten specific instances, five have been concluded by the NCP, one was closed without a statement in 2004, one was transferred to another NCP and three are ongoing.

Among the five concluded cases:

- three were concluded with agreement within the NCP process (see Annex D, specific instances 4, 5 and 6)
- one was concluded with an agreement outside the NCP process (see Annex D, specific instance 3)
- and one was concluded without agreement, but with recommendations from the NCP (see Annex D, specific instance 2).

The main sector concerned by specific instances concluded by the NCP is manufacturing (three cases). Three specific instances concerned respectively the construction, financial and insurance activities, and information and communication sectors. The 2004 specific instance closed without a statement was in the mining sector. In terms of submitters, five specific instances were raised by NGOs and three by trade unions.

The most frequently raised chapters of the Guidelines in cases handled by the NCP are the chapters on Employment and Industrial Relations (four), human rights (four), and the environment (three). Combating bribery, bribe solicitation and extortion, consumer interests, and general policies were each raised once.

An overview of all cases handled by the NCP is available in Annex D.

Case-handling procedures

Overview

The following analysis focusses predominately on the English language procedures as publicly available at the time of writing. The procedures of the NCP relevant to handling specific instances are laid out in Chapter 5 of the Rules of Procedure, accompanied by a “Guidance on Grievance Procedures” (Guidance) and forms to submit a specific instance on the website. The Guidance and Rules of Procedure were updated following the update of the 2023 Guidelines (see section 3). The Rules of Procedure and Guidance document are available in English and German, the submission form in English, German and French.

Chapter 5 of the Rules of Procedure has 15 subsections, covering general information on the specific instance process, such as “Nature of the grievance procedure” or “Costs of the grievance procedure”, as well as detailed sections following the steps of the process, from initiating the grievance procedure” to “Follow up” and “Feedback of the Parties” on the specific instance process. The Guidance has six different chapters: the first provides an overview of the chapters of the Guidelines, the second of the NCP and NCP core effectiveness criteria, the third of characteristics of the grievance procedure, whereas the fourth provides detailed information following the process of a specific instance. The fifth chapter contains information on protection against reprisals and data protection and the sixth contact details of the NCP.

A section on the English webpage has a brief overview to the specific instance process and links to the Rules of Procedure and Guidance, the submission form, as well as past statements of the NCP. The German webpage has a subsection on the NCP as a grievance mechanism, which additionally has questions and answers about the specific instance process, including information on what a complaint should entail or what the benefits are of participating in the process.

Business stakeholders and some civil society stakeholders generally found the procedures and Guidance to be user-friendly.

Filing a complaint

Submissions may be made in writing by e-mail, if possible, using the submission form, or via post. Section 5.3 of the Rules of Procedure state that “any person or organisation may submit a complaint [...] on their own behalf or as legitimate representatives regarding an alleged contravention of the Guidelines by multinational enterprises”. The Guide in Section 4.1 provides further details, noting that the complaint needs to describe the interests and intentions of the submitters and “provide consistent and reasonable arguments”. According to Section 4.2 of the Guidance, the NCP will check if the submission is complete. It is complete if it includes name and contact information of the submitter and company involved, the relevant provisions of the Guidelines, a presentation of the facts, if relevant a description of the company’s relationship to the company allegedly violating the Guidelines, and the submitters legitimate interest in the case. Section 4.2 also states that the submitter must be named and provide contact details. The NCP may request additional information where required.

The Submission form is available on the website in three languages. When accessing the form through the website, users need to create an account. The form has 30 items for input in total divided into seven

sections, and no specific indications which fields are mandatory to form a “complete” complaint. Next to asking about information on the submitter and respondent, the form asks to outline the relevant organisation or company structure about the respondent, information about relevant chapters of the Guidelines, place where the impacts occur, facts relevant to the case and supporting documentation, what submitters hope to achieve and what actions submitters think the respondent should take, as well as providing information on the business relationship if the respondent is not directly causing the impact. The form also asks to submit past communications with the respondent on the issues if available and information about parallel proceedings and past attempts to solve the issues. An extract of the form is showcased in Figure 5 below.

Stakeholders generally agree that the information to submit a case is easily accessible on the website. However, civil society stakeholders noted that it may be more accessible to organised stakeholders than to right-holders and potential complainants from the Global South. A civil society stakeholder noted that language barriers, lack of awareness and absence of direct support services remain obstacles to accessibility and suggested that key instructions should be translated into more languages. It was further observed that the requirement to create an account constitutes an unnecessary barrier.

Figure 5. Submission form

 **Federal Ministry**
Republic of Austria
Labour and Economy
 Austrian National Contact Point

Template for Submitting a Specific Instance to the Austrian NCP

A. About the notifier:	
1. Name of organisation or individual	
2. Telephone number	
3. Postal address	
4. Email address	
5. Website (if available)	
6. Contact person 1	
Name	
Position	

Note: This is an extract, showing the top of the form.

Source: Federal Ministry for Digital and Economic Affairs (n.d.^[25]), Template for Submitting a Specific Instance to the Austrian NCP, https://www.bmwet.gv.at/dam/jcr:58070a31-12cc-4814-913e-1bcd92523121/Neu%20Template%20Besonderer%20Fall_Englisch_barrierefrei%20und%20gepr%C3%BCft.pdf.

Competence of the NCP and co-ordination with other NCPs on specific instances

Section 5.7.1 Rules of Procedure is titled “International competence” and sets out that the NCP has competence if i) the alleged violation took place in Austria, (ii) the enterprise concerned is headquartered in Austria and the country where the alleged violation took place does not have an NCP, (iii) another relevant interest exists to warrant the NCP’s competence, (iv) or if “handling of the complaint cannot be assured otherwise.” If the NCP does not consider itself the competent body for a complaint, it informs the complainant.

According to Section 5.7.2, the NCP will co-ordinate in good faith with other NCPs to name a lead and supporting NCPs if the complaint concerns another or several NCPs. The parties will be consulted before a decision to transfer a case and, where possible, the lead NCP should be identified within two months of submission.

Initial assessment

If the NCP finds it is the competent body and that the submission is complete, the NCP contacts the respondent and transfers the submission, explains the proceedings, and asks the respondent for a comment within four weeks, to be forwarded to the submitters (Section 5.8.1 Rules of Procedures). The NCP will seek to engage the respondent in the process and will offer all parties individual meetings to explain the process and the case-handling framework (Section 5.8.2). The NCP can request further comments from the parties where necessary.

Section 5.8.3 sets out six criteria and additional considerations to assess whether the issues raised warrant further examination. The criteria and additional considerations on content largely align with criteria of para 33 of the Procedures, though they provide further details and do not mention considering how applicable law and parallel proceedings might hinder a resolution of the issues. The six criteria are:

- a clearly demonstrated legitimate interest of the complainant, and, where relevant, lawful power of representation
- a material and substantiated complaint, meaning a complaint that is relevant to the Guidelines and contains allegations that appear credible and have a “plausible link between the enterprise’s activities and issues raised”, though this does not mean that submitters carry the burden of proof
- an enterprise as respondent
- which is a multinational, interpreted broadly, considering corporate structure, business activities and business form and purpose
- and which operates in or from and Adherent to the Guidelines
- a link between the business activities of the respondent and alleged violations.

Additionally, the NCP will consider whether it could “contribute to the resolution of the issues” and whether a specific instance would “contribute to the effectiveness of the Guidelines”.

The NCP will not accept a specific instance if one criterion is not met, will aim to conclude the initial assessment stage within three months and will provide an opportunity for comment to the parties before issuing its initial assessment (Sections 5.8.4 and 5.8.5 Rules of Procedures).

An FAQ in Section 4.5.2 of the Guidance on the initial assessment stage addresses how “enterprises [should] deal with a complaint”, noting that though it is a voluntary process, it should “be understood as a valuable source of learning”, and that participation can help find joint solutions to issues with the stakeholder filing the case. The answer also highlights that the NCP process is an efficient and cost-effective process strengthening stakeholder relationships, and that the complaint will be made public and “can have major consequences, e.g. for the reputation of an enterprise or for public procurement and funding systems”, or for review processes of the export credit agency.

Good offices

Section 5.9 of the Rules of Procedure outlines the good offices stage. At the outset of the good offices, both parties will be given an opportunity to present their perspectives and the NCP will discuss with the parties the expectations. The NCP will offer mediation, which will be based on written comments received as well as mediation meetings with the parties. The mediation may be conducted by the NCP itself or by an external mediator and the NCP may prepare Terms of Reference, covering procedural and logistical aspects of good offices. As a general rule, mediation meetings will take place at the headquarters of the NCP in Vienna and will be in German; however, the parties may agree to use English instead. The sessions may be held virtually or at another location with the consent of the NCP.

Section 4.6 of the Guidance further clarifies that the NCP may seek guidance from competent authorities, experts, other NCPs, the OECD Secretariat, the Working Party on Responsible Business Conduct or the Investment Committee as well as the LAUS. It also sets out that the NCP may discontinue mediation if a party does not engage in good faith.

Conclusion

The sections covering conclusion of the procedure outline three possible outcomes: (i) good offices are declined, (ii) the parties come to an agreement, and (iii) good offices are accepted but parties are unable to reach an agreement. Section 5.10 of the Rules of Procedure describe what information the final statement will at a minimum entail for each of the scenarios, largely following section I.C.4 of the Procedures. Notably however, Section 5.10.1 (good offices are declined) does not mention that the NCP may include recommendations, whereas Sections 5.10.2 and 5.10.3 covering the other two scenarios do. The Rules of Procedure also do not mention the possibility for the NCP to make determinations on issues not covered by the Guidelines.

Section 5.13 of the Rules of Procedures further states that if the submitters withdraw the complaint before the process is concluded, the NCP will close the process and inform the respondent respectively. It does not specify whether the NCP will issue a final statement in such a case.

A civil society stakeholder encouraged the NCP to change the case-handling framework to include the option to make recommendations even if mediation is declined and to make determinations, which could promote a correct understanding of the Guidelines and provide other benefits.

Follow up

The NCP may engage the parties in a follow-up. This will be mentioned in the final statement (Section 5.12 Rules of Procedure). Section 4.9 of the Guidance explains that the final statement is not intended to provide an abrupt end but that rather it will be up to the enterprise to implement any measures described in the agreement or, on a voluntary basis, recommendations.

Indicative timelines

The NCP will aim to conclude the process within 12 months or within 14 months if co-ordination with another NCP is needed. Deviation from indicative timelines might occur, including due to “situations when the issues arise in a non-Adherent, when the specific instance involves multiple enterprises, multiple submitters or multiple NCPs, or when translations are necessary, or when the Austrian NCP needs to consult with its Steering Committee, the OECD or public authorities” (Section 5.11 Rules of Procedure).

Confidentiality and transparency

Section 5.9.2 of the Rules of Procedure and 4.6.2 of the Guidance cover transparency and confidentiality expectations. They are aligned with and describe the provisions of paras 48 and 49 of the Commentary to the Procedures. This includes setting out that the process is guided by the principle of transparency and that information submitted by one party will generally be shared with the other party. Only if a party has a legitimate interest such as safety concerns and risks of reprisals or business and trade secrets will the NCP consider not forwarding the information or redacting the documents accordingly. The sections further establish that, as a general principle, parties should not share information received through the proceedings with third parties or the general public, unless it is in the public domain, the parties and NCP agree to the disclosure, or it is required by law. Finally, the sections clarify that there will be a public initial assessment and final statements and parties are free to share the existence of the case as well as the reasons for submitting the complaint.

Section 3.2 of the Guidance sets out expectations on good faith behaviour and states that public campaigns against parties may damage the trust between parties and therefore jeopardise the success of the mediation. Any behaviour jeopardising the success of mediation should be avoided. The Rules of Procedures do not contain a ban on campaigning.

Civil society stakeholders strongly recommended that language in Section 3.2 of the Guidance be adjusted to language of the Rules of the Procedures and not discourage public campaigning.

Protection against Reprisals

Section 5.15 of the Rules of Procedure and 5.1 of the Guidance state that any retaliation against those involved in the process, including the NCP, will not be tolerated. It further explains what may constitute a reprisal, including threats of physical or psychologically harm or legal action, and that the NCP will take measures to prevent and respond to risks of or actual reprisals. Such measures may include keeping the identity of a person confidential, documenting attempted reprisals or involving relevant authorities or embassies.

Impartiality and avoidance of conflict of interest in handling specific instances

Section 3 of the Rules of Procedure outline how the NCP acts in accordance with the effectiveness criteria, and section 3.5 (Impartiality and equity) states that the “NCP will seek to prevent conflicts of interest” and that it “acts in an impartial manner and ensures fair and equitable terms vis-à-vis the parties”. The Rules of Procedures do not have more detailed provisions regarding the NCP itself, but state that if the NCP engages an external mediator, this person must be impartial and not have a conflict of interest.

Members of the NCP are civil servants and therefore subject to laws requiring officials to fulfil their duties with impartiality (§ 43 Civil Service Law [Bundesgesetz vom 27. Juni 1979 über das Dienstrecht der Beamten]). Officials must also refrain from exercising their office and arrange for replacements in case of important reasons that are likely to cast doubt on their complete impartiality (§ 47 Civil Service Law).

Parallel proceedings

The existence of any parallel processes, judicial or administrative, running or concluded, will not in itself constitute a reason for the NCP to refuse acceptance of a submission (Section 5.2 Rules of Procedure and 4.5.1 Guidance document). The same applies to the existence of alternative avenues submitters could pursue. The NCP instead examines on a case-by-case basis if good offices could contribute to resolution of the issues and whether adverse impacts on the other proceedings are expected. The NCP explicitly encourages the parties to come to an agreement also outside the specific instance process. The NCP will refer to an agreement reached outside the process in its final statement (Section 4.6.4 of the Guidance).

Specific instances in practice

Co-ordination with other NCPs on specific instances

The NCP has acted in seven cases as a supporting NCP, and since the 2011 update of the Guidelines in two cases.

Table 8. Specific instances where the Austrian NCP had co-ordinated with other NCPs

Specific instance	Lead NCP	Supporting NCP(s)
Employment issues in the manufacturing sector in Indonesia	United States	Austria
Mining activities in the Democratic Republic of the Congo	Austria	Germany
Mining in conflict-affected zones in the Democratic Republic of the Congo	Switzerland	Austria
Employment issues in the manufacturing sector in the United States	United States	Austria
Company closure in Italy	Italy	Austria
Krall & A. Knight International Ltd.	Germany	Austria
Relatives of a worker & AES Gener S.A., ATB Riva Calzoni SpA, Strabag SpA.	Chile	Austria, Italy, the United States
A family in central Europe, supported by an Australian national & a French Group	France	Australia, Austria, Germany, the Netherlands, Poland, the United States

Source: OECD (n.d.^[26]), National Contact Points for Responsible Business Conduct Database, <https://mneguidelines.oecd.org/database/>.

Non-accepted cases

One out of eight specific instances received was not accepted (see Annex D, specific instance 7). Since 2011, one out of five specific instances was not accepted by the NCP. The reason for not accepting the case was that the NCP was not the correct entity and it referred the case to another NCP.

One specific instance was closed without mediation or final statement in 2004 as the situation on the ground did not allow an assessment of the raised issues (see Annex D, specific instance 1).

The NCP has not published a statement on its webpage regarding the specific instance it transferred to another NCP (see Annex D, specific instance 7).

Accepted cases

Out of ten cases received, five have been concluded (one following the 2019 peer review).

Outcomes in cases in which the NCP offered good offices include the following:

- four cases were concluded with agreement (see Annex D, specific instances 3, 4, 5, 6), one of which with an agreement outside the NCP process (see Annex D, specific instance 4)
- one case was concluded without agreement (see Annex D, specific instance 2).

Two out of the five concluded cases were handled prior to the 2011 Guidelines, which notably formalised the process for initial assessments and published statements. One of these concluded specific instances was handled after the NCP's 2019 peer review. All three specific instances that were concluded and handled under the 2011 Guidelines resulted in an agreement: in two cases the parties benefitted from mediation by the NCP (see Annex D, specific instances 5 and 6), and in one case the parties found an agreement outside the NCP process three weeks after submitting the specific instance (see Annex D, specific instance 4). One case included recommendations (see Annex D, specific instance 5), none

included a determination, and two included plans for follow up (see Annex D, specific instances 5 and 6). Of the two cases that benefitted from mediation by the NCP under the 2011 Guidelines, the NCP engaged with the parties directly in both, and in no case involved the use of an external mediator.

In terms of issues raised in the three cases concluded since 2011, Human Rights and General Policies were raised in two cases (see Annex D, specific instances 5 and 6), and Disclosures (see Annex D, specific instance 6), Employment and Industrial Relations (see Annex D, specific instance 4) and Environment (see Annex D, specific instance 5) each once.

The NCP has published initial assessment statements and final statement in both concluded cases that went to mediation handled since 2011. In the case in which the parties came to an agreement outside the specific instance process, the NCP did not publish a final statement. In the case submitted in 2014, the final statement describes the positions of the parties in detail, the process and progress made during mediation, the issues covered, provides recommendations to the parties, and annexes the agreement concluded between the parties (see Annex D, specific instance 5). In contrast, the final statement of the specific instance concluded in 2024 is shorter (see Annex D, specific instance 6). After summarising background information on the process and setting out the positions of the parties, the final statement summarises briefly the good offices process and notes that parties came to an agreement.

The NCP considers that the absence of a specific mandate in Austrian law limits its ability to publish statements without consent from the parties regarding as to their content. Likewise, it considers that it does not have the mandate to make determinations, as such authoritative administrative activity of a part of the federal administration would require a formal legal basis under Art 18 of the Austrian Federal Constitution, which the NCP does not have. Similarly, the NCP noted it lacks a legal basis to make recommendations of its own initiative. For these reasons, the NCP does not publish any statement without consent of the parties. This leads to delays (see below Timeliness), and a lack of depth in the NCP's analysis of the issues and recommendations in statements. Likewise, it hinders the NCP's ability to facilitate solutions to the issues if parties do not engage.

A business stakeholder involved in a specific instance positively highlighted the support of the NCP in finding an amicable solution within a very structured mediation process and appreciated that the NCP had profound knowledge of the Guidelines. Two business stakeholders involved in instances also appreciated the responsiveness of the NCP, as well as how clearly the NCP explained its role and the overall process of the grievance mechanism. A civil society stakeholder appreciated transparent communications of the NCP throughout the process. A civil society stakeholder noted a power imbalance in mediation due to the fact that the process was voluntary and the company could leave at any point, which was to some extent counterbalanced by using the Guidelines as a reference during mediation meetings. A business stakeholder noted that the process helped them improve their internal structures around human rights risks.

A civil society stakeholder noted that because the NCP does not make determinations and the statements are not detailed, it may not be a good process for potential submitters seeking remedy through an institutional acknowledgment of wrongdoing.

Box 2. The Open Society Justice Initiative & Telekom Austria AG

On 16 March 2022, the Open Society Justice Initiative, an NGO involved in strategic human rights litigation and other legal work, submitted a specific instance to the Austrian NCP alleging that the IT services company Telekom Austria AG, had not observed the General Policies (Chapter II), Disclosure (Chapter III) and Human Rights (Chapter IV) provisions of the Guidelines. The submission alleged that the company was involved in a series of state ordered and politically motivated mobile internet shutdowns in Belarus during 9 August 2020 and 29 November 2020, leading to severe human rights violations. The company stated it had to fulfil state orders, the non-compliance of which would have had severe consequences.

The NCP accepted the specific instance with an initial assessment on 1 August 2023, offering good offices. Both parties accepted and the NCP conducted three meetings in person, taking a forward-looking approach. During the last meeting, the parties agreed on a confidential memorandum of understanding.

The parties both provided positive feedback noting constructive, focussed mediation meetings, and appreciated the openness of the other party. They appreciated that the NCP communicated transparently about process steps and possible outcomes and that there had been clear arrangements around confidentiality. One party recalled that the NCP during mediation meetings had not actively proposed possible terms of agreement but rather focussed on facilitating the discussion. One party noted that the initial assessment process took longer than the indicative timeline.

Source: Austria NCP (2024^[27]), The Open Society Justice Initiative & Telekom Austria AG, <https://www.oecd.org/en/networks/national-contact-points-for-responsible-business-conduct/database/at0006.html>

Follow up

The NCP has conducted follow-up in one specific instance in 2018, handled after the 2011 update of the Guidelines. Follow up was published 16 months following publication of the final statement. The NCP is planning a follow-up in a second case in early 2026.

Timeliness

The average overall duration of two cases concluded by the NCP handled under the 2011 Guidelines of which data is available is 1 021 days, which exceeds the indicative timeframes (365 days under the 2011 Guidelines). The duration of the non-accepted case was 83 days. Of the two cases for which data is available handled under the 2011 Guidelines, the duration of the initial assessment was 43 (see Annex D, specific instance 5) and 503 (see Annex D, specific instance 6) days respectively, leading to an average duration of 273 days. It received a specific instance in May 2024, which at the time of the on-site visit did not have an initial assessment. Overall, the NCP has not been able to follow indicative timelines. Reasons for this have included delays due to co-ordination with another NCP, delays in negotiations around confidentiality arrangements in terms of reference, and disagreements between parties of how to reflect the issues in an initial assessment.

Trade union stakeholders highlighted that long process durations can deter submitters who need to weigh the potential benefits of a specific instance process versus the resources required to follow a process over multiple years. One business stakeholder party to a specific instance positively noted that the process had concluded within the previously mutually agreed upon timeline. Another business stakeholder reported that

the duration of the process was much longer than originally planned, however the NCP was not at fault for this.

Civil society stakeholders noted that the NCPs current structure and resource capacities do not seem to allow the NCP to act in a timely manner and that delays may have a negative effect on the predictability of the process. A government stakeholder similarly considered that a reason for delays may be a lack of resources, particularly now, as the NCP has received multiple specific instances.

Confidentiality and transparency

The NCP publishes initial assessments, final statements and follow-up statements on its webpage. In some cases, the NCP encourages parties to agree to Terms of Reference for mediation, which include expectations on confidentiality. In one case, one of several submitters left the specific instance process because the confidentiality agreement did not meet its standards on transparency. The NCP has not experienced a breach of confidentiality arrangements.

Civil society and trade union stakeholders observed that the focus on confidentiality makes the process difficult to access. Business stakeholders that had been party to a specific instance appreciated the approach of the NCP to confidentiality, noting that the NCP was able to support the parties to find solutions where party expectations on confidentiality had been contradictory.

Impartiality and avoidance of conflict of interest in the handling of specific instances

Stakeholders had differing perceptions of the NCP's impartiality. Generally, stakeholders perceived the NCP to act impartially, including business stakeholders involved in specific instances and a member of LAUS, pointing to the impartial way the NCP conducts itself during the meetings there. Some stakeholders perceived the NCP to not have strong guarantees of impartiality due to its position within the ministry and lack of formalisation of the distinct NCP unit (See Institutional arrangements). Civil society stakeholders furthermore noted that to ensure equitable proceedings, particularly for non-European complainants, the NCP lacks resources to provide support measures such as interpretation or financial support, conduct on-site visits, and facilitate travel to Vienna.

Table 9. Findings and recommendations – Specific instances

	Finding	Recommendation
3.1	The NCP's statements are limited in terms of analysis of the issues with respect to the Guidelines and its recommendations. This is particularly the case when parties do not willingly engage in good offices.	The NCP should use its expertise to assist with resolving issues raised in specific instances through more detailed statements, recommendations, and corresponding interpretations of the Guidelines.
3.2	The NCP has not been able to keep within indicative timeframes, which diminishes predictability and the value of the process for some submitters. While not always due to the NCP, in some cases this was due to lack of staff and very formal working methods.	The NCP should seek ways to keep within the timelines as much as possible, for instance by publishing shorter initial assessments.

7 Support for government policies to promote RBC

In line with the Implementation Procedures (OECD, 2023^[28]; 2023^[1]), NCPs may support efforts by their government to develop, implement, and foster coherence of policies aimed at promoting RBC. NCPs may thus assist with implementation of the Recommendation on the Role of Government in Promoting Responsible Business Conduct (OECD, 2022^[29]) (the Recommendation). The Recommendation recognises the important role of NCPs in ensuring policy coherence for RBC, notably by facilitating co-ordination within government, disseminating information on the NCP's activities and specific instances, engaging or exchanging with other public authorities on RBC-related issues (e.g. public procurement officers, state-owned enterprise officials, trade and investment officials), and promoting stakeholder participation in the implementation, monitoring and promotion of RBC.

The position of the NCP within the Federal Ministry of Economy, Energy and Tourism, together with the composition of its steering committee, provides the NCP with access to a wide range of federal ministries.

Recent governmental policies enabling and promoting RBC

Austria has been in the transposition and implementation process of EU legislations related to RBC. Austria amended the Employment Contract Adjustment Act (AVRAG) (Austrian Federal Government, 2026^[30]) and the General Civil Code (ABGB) (Austrian Federal Government, 1811^[31]), which came into force in March 2024, to support implementation of the EU Forced Labour Ban Forced Labour Ban (European Parliament and Council of the European Union, 2024^[32]). The European Corporate Sustainability Reporting Directive (CSRD) (European Parliament and Council of the European Union, 2022^[33]) is still in the process of being transposed. The “Nachhaltigkeitsberichtsgesetz (NaBeG)” (Sustainability Reporting Act), intended to implement CSRD requirements at the national level, remains a proposal and has not yet been adopted (Austrian Parliament, 2025^[34]).

Nationally, the Federal Ministry of Finance developed the Austrian Master Plan Raw Materials 2030, adopted in December 2021, to ensure a secure, sustainable and resilient supply of mineral resources (Federal Ministry of Agriculture, Regions and Tourism, 2021^[35]). The plan references the OECD Guidelines as relevant international instruments. The Federal Ministry of Social Affairs has long supported projects and studies on CSR, and business and human rights and advocates for binding corporate regulations in global supply chains (Federal Ministry of Labour, Social Affairs, Health, Care and Consumer Protection, 2024^[36]). Austria's Council of Ministers adopted a trade strategy in 2018, which references the NCP as a one-stop-shop for responsible business conduct (Federal Ministry of Economy, Energy and Tourism, 2018^[37]).

Austria has a National Action Plan on Sustainable Public Procurement, updated in 2021. Its objectives include harmonising sustainability criteria in public procurement and anchoring them in procurement practices of all federal institutions. In 2019, the Economic ministry and Federal Public Procurement Agency set up a platform, naBe, as a point of contact for questions related to sustainability and public procurement,

which organises events and workshops (naBe platform, 2026^[38]). Austria's Export Credit Agency references the OECD Common Approaches and commits to a Sustainability Strategy of the Export Promotion Procedure of the Federal Ministry of Finance (OeKB, n.d.^[39]).

National Action Plan on Business and Human Rights

Currently Austria does not have a NAP and there is no available information on whether Austria is aiming to create a NAP in the coming years.

The role of the NCP

Since 2022, the NCP participates in a range of evaluation processes for legislative initiatives at both the national and international level, including the EU Corporate Sustainability Due Diligence Directive (CSDDD) (European Parliament and Council of the European Union, 2024^[40]), the EU Forced Labour Regulation, the Austrian Master Plan Raw Materials 2030 and the Austrian Defence Strategy, to promote responsible business conduct and ensure policy coherence.

NCP staff, though not in their capacity as an NCP, was particularly involved in the CSDDD legislative process from 2022-2024. While the Federal Ministry of Justice served as the lead ministry, the NCP staff helped develop Austria's position, participated in working party meetings in Brussels, and organised a stakeholder roundtable to gather feedback. For the NCP staff, this process was highly resource intensive and the NCP staff continues to maintain regular contact with the Federal Ministry of Justice on this matter.

Furthermore, the NCP contributed to interministerial consultations on other EU legislative processes, providing statements, opinions, and input on initiatives such as the Forced Labour Regulation and the CSRD. On the enforcement side, the NCP works closely in regular exchanges with the competent authority (the Austrian Federal Ministry of Finance, Department VI/5 – Mineral Resources Policy) enforcing the EU Conflict Minerals Regulation (European Parliament and Council of the European Union, 2017^[41]).

The NCP participates in Austria's Universal Periodic Review (UPR) by the UN Human Rights Council (3rd cycle concluded in 2021; 4th cycle starting October 2025) through participating in stakeholder meetings, providing written comments and national reports, and taking part in the interministerial co-ordination.

The NCP actively participates in interministerial co-ordination on topics relevant to RBC. The NCP reports its work in the interministerial Agenda 2030 implementation process and promotes the OECD Guidelines to the competent department for trade and investment policy SME policy in the Federal Ministry on a regular basis. The NCP also co-operates with the Austrian Development Bank and the Austrian Development Agency through regular exchange meetings and participation in relevant NCP events and informs officials responsible for trade missions and the Austrian Export Credit Agency of NCP activities and specific instances. Additionally, the NCP has started reaching out to and co-operating with sustainability initiatives at the regional level, such as the Government of Styria.

Stakeholders reported that the NCP actively advocates with its rich expertise in support of RBC government policy, sharing its expertise with other government officials. Stakeholders specifically highlighted the NCP's engagement on the CSDDD and the stakeholder consultations the NCP organised. However, they noted that its effectiveness is limited by the level of political will. Civil Society stakeholders observed that, due to its institutional structure, the NCP is not able to engage in political discourse independently. A civil society stakeholder noted that the NCP has insufficient resources to effectively promote RBC.

Table 10. Findings and recommendations – Support for government policies to promote RBC

	Finding	Recommendation
4.1	The NCP, or its staff in other capacities, is connected to the main ministries and agencies related to RBC. Its level of involvement varies by ministry and issue, ranging from active engagement to a consultative or informational role.	The NCP should continue its engagement with the policy community and seek ways to promote a more complete alignment of Austrian policies with the Guidelines.

Annex A. Organisations that responded to the NCP peer review questionnaire

Table A A.1. List of organisations that submitted a response to the NCP peer review questionnaire

Business
UN Global Compact Network Austria
Federation of Austrian Industries
Wirtschaftskammer Österreich
OeKB
Austrian Development Bank
OeEB AG
Andritz AG
Telekom Austria AG
Trade unions / Worker representatives
Chamber of Labour
Austrian Trade Union Federation (ÖGB)
Bundesarbeitskammer, BAK
CSOs
Dreikönigsaktion der Katholischen Jungschar / DKA Austria
Suedwind – Association for development policy and global justice
WWF Austria
Global Responsibility
Government
Federal Ministry of Finance Austria, Department of Mining
Federal Ministry of Finance, Austria
Federal Ministry of Justice, Austria
Head of Steering Committee of the Austrian NCP; Head of Unit for EU Co-ordination and EU Single Market of the Federal Ministry of Economy, Energy and Tourism Main functions and activities of NCPs
Federal Chancellery, Department IV/5: Economy, Labour Market and Energy, Austria
Federal Ministry of Labour, Social Affairs, Health, Care and Consumer Protection, Austria
Federal Ministry of Justice, Austria, member of the Steering Committee since 2024
Academia / experts
Prof. Wolfgang Mazal Member of the LAUS (Steering-Committee)
Univ. Prof. Dr. Ursula Kriebaum
DKA Austria and WU Vienna
NCPs
NCP Czechia
NCP Switzerland
NCP Sweden
NCP Croatia
NCP Germany

Annex B. Organisations that participated in the NCP peer review on-site visit

Table A B.1. List of organisations that participated in the NCP peer review on-site visit

Business
Federation of Austrian Industries
Borealis Group
Andritz AG
respAct
UN Global Compact
A1 Telekom Austria AG
KPMG
Austrian Chamber of Commerce
Trade unions
Austrian Chamber of Labour
Austrian Trade Union Federation
TUAC
CSOs
Südwind
WWF
AG GV
Austrian League for Human Rights
Open Society Justice Initiative
Academia
DKA
WIFO
Government
Federal Ministry for European and International Affairs of Austria
Federal Chancellery of Austria
Federal Ministry of Economy, Energy and Tourism
Labour, Social Affairs, Health, Care and Consumer Protection
Federal Ministry of Justice
Austrian Development Bank
Platform Sustainable Procurement
State Styria
Austria's Export Credit Agency
Federal Ministry of Agriculture and Forestry, Climate and Environmental Protection, Regions and Water Management
Federal Ministry of Finance
Federal Chancellery Republic of Austria

Annex C. Promotional events

Table A C.1. Promotional activities in 2024 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Webinar 1: Due diligence obligations in the agriculture sector	31-Jan-2024	Online	10-50	Organised	Business, NGOs, Trade Unions, Academia, Government
Exchange on RBC	13-Feb-2024	Federal Ministry of Labour and Economy	10-50	Organised	Government
Webinar 2: Due diligence in the textile sector	22-May-2024	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government
Roundtable for employee representatives 1	16-Apr-2024	Online	10-50	Organised	Business, Trade Unions
Exchange on RBC	09-Jul-2024	Federal Ministry of Labour and Economy	10-50	Organised	Government
Exchange meeting with civil society representatives 1: WWF Österreich, DKA (Dreikönigsaktion)	01-Aug-2024	Federal Ministry of Labour and Economy	<10	Organised	NGOs
Multi-Stakeholder Forum	21-Oct-2024	Federal Ministry of Labour and Economy	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government
NCP Peer Learning Event	22-Oct-2024	Federal Ministry of Labour and Economy	10-50	Organised	Other NCPs
Webinar 3: Corporate due diligence: Good practices and the role of audit and conformity assessment bodies	05-Nov-2024	Online	50-100	Co-organised	Business, NGOs, Trade Unions, Academia, Government
Roundtable for employee representatives 2	25-Nov-2024	Online	50-100	Organised	Business, Trade Unions
Exchange meeting with civil society representatives 2: AG Globale Verantwortung, DKA (Dreikönigsaktion), WWF Österreich	26-Nov-2024	Federal Ministry of Labour and Economy	<10	Organised	NGOs

Source: NCP Reporting Questionnaire (2024).

Table A C.2. Promotional activities in 2024 participated in by the NCP

Title	Date	Location	Size of Audience	Organiser	Target audience
Responsible Supply Chains	28-Feb-2024	Linz	50-100	Business Upper Austria	Business, Government
Supply Chain Summit: Business Breakfast	11-Nov-2024	Vienna	10-50	Austrian Chamber of Commerce	Business, Academia, Government
Nabe Fachtagung 2024	11-Nov-2024	Vienna	50-100	Action plan on public procurement	Government
Sustainable Economics	19-Dec-2024	Vienna	10-50	Vienna Business University	Academia

Source: NCP Reporting Questionnaire (2024).

Table A C.3. Promotional activities in 2023 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Webinar I: Due diligence in the finance sector and its impact on companies	27-Apr-2023	Online	10-50	Organised	Business, NGOs, Trade Unions, Academia, Government
Exchange meeting with civil society representatives (AG Globale Verantwortung, DKA)	26-Jun-2023	Federal Ministry of Labour and Economy	<10	Organised	NGOs
Webinar II: Differences in dealing with due diligence obligations along the global supply chains from the perspective of large and small enterprises	27-Jun-2023	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government
Exchange meeting with Austrian Federal Ministry of European and International Affairs	11-Jul-2023	Federal Ministry of European and International Affairs	<10	Co-Organised	Government
Exchange meeting with Wirtschaftskammer Österreich (Austrian Federal Economic Chamber)	19-Jul-2023	Federal Ministry of Labour and Economy	<10	Organised	Business, Government
Exchange meeting with civil society representatives (AG Globale Verantwortung, DKA)	16-Oct-2023	Federal Ministry of Labour and Economy	<10	Organised	NGOs
Webinar III: Implementation of due diligence in environmental and	17-Oct-2023	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
climate protection					
Roundtable for employee representatives	24-Oct-2023	Federal Ministry of Labour and Economy	10-50	Organised	Trade Unions
Multi-Stakeholder Forum for Responsible Business Conduct	14-Nov-2023	Federal Ministry of Labour and Economy	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government

Source: NCP Reporting Questionnaire (2023).

Table A C.4. Promotional activities in 2023 participated in by the NCP

Title	Date	Location	Size of Audience	Organiser	Target audience
Supply Chain Act for a Raw Material Shift	16-Jun-2023	House of the EU	50-100	Liaison Office of European Parliament in Austria, Civil Alliance "AG Rohstoffe"	Business, NGOs, Trade Unions, Academia, Government
UPR Follow-Up	06-Jul-2023	Federal Chancellery	10-50	Federal Ministry for European and International Affairs	NGOs, Business
Due Diligence along the Supply Chain	11-Sep- 2023 – 13-Sept-2023	University of Vienna	10-50	University of Vienna, Kyoto University	Business, NGOs, Trade Unions, Academia, Government
Re-Sourcing Conference: Presentation of Study on Austrian Success Stories in Supply Chain Responsibility	22-Sep-2023	Vienna University of Economics and Business	10-50	Vienna University of Economics and Business	Business, NGOs, Trade Unions, Academia, Government
Supply Chain Summit	12-Dec-2023	Wirtschaftskammer Österreich	-	Wirtschaftskammer Österreich (Austrian Chamber of Commerce)	Business, Government

Source: NCP Reporting Questionnaire (2023).

Table A C.5. Promotional activities in 2022 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Webinar: Identifying Human Rights Risks	03-Mar-2022	Online	50-100	Organised	Business, NGOs, Academia, Trade Unions, Government
Shaping Global Responsibility	16-Mar-2022	Online	10-50	Organised	Trade Unions
Webinar: Addressing Human Rights Risks	28-Apr-2022	Online	50-100	Organised	Business, NGOs, Academia, Trade Unions, Government
Webinar: Setting up effective complaint mechanisms	24-May-2022	Online	50-100	Organised	Business, NGOs, Academia, Trade Unions, Government
Webinar: Handling mandatory due diligence	13-Sep-2022	Online	50-100	Organised	Business, NGOs, Academia, Trade Unions, Government

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Shaping Global Responsibility	20-Sep-2022	Online	10-50	Organised	Trade Unions
Shaping Global Responsibility	09-Nov-2022	Online	10-50	Organised	Trade Unions
Multi Stakeholder Forum – Human Rights in the Focus	29-Nov-2022	Federal Ministry of Labour and Economy	50-100	Organised	Business, NGOs, Academia, Trade Unions, Government

Source: NCP Reporting Questionnaire (2022).

Table A C.6. Promotional activities in 2022 participated in by the NCP

Title	Date	Location	Size of Audience	Organiser	Target audience
Ist die Welt noch zu retten? - Halbzeitbilanz der UN-Ziele für nachhaltige Entwicklung (Agenda 2030)	28-Sep-2022	ÖGB, RIVERBOX (Johann-Böhm-Platz 1, 1020 Wien)	10-50	Austrian Trade Union Federation	NGOs, Trade Unions

Source: NCP Reporting Questionnaire (2022).

Table A C.7. Promotional activities in 2021 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Current Developments in Due Diligence	23-Feb-2021	Online	>100	Organised	Business, NGOs, Trade Unions, Academia, Government, General Public
Due Diligence in Garment and Footwear sector	20-Apr-2021	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government, General Public
Due Diligence in practice	23-Jun-2021	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government, General Public
Dialogue with Employee Representatives: Help shaping Global Responsibility	01-Jul-2021	Online	10-50	Organised	Trade Unions, Labour stakeholders
Multi-Stakeholder Forum: Due Diligence in complex value chains	19-Oct-2021	Online	50-100	Organised	Business, NGOs, Trade Unions, Academia, Government
Exchange with civil society representatives on RBC developments and the NCP activities	20-Dec-2021	Online	<10	Organised	NGOs
Exchange with responsible	13-Dec-2021	Online	<10	Organised	BMLRT

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
authority for the conflict mineral regulation					

Source: NCP Reporting Questionnaire (2021).

Table A C.8. Promotional activities in 2021 participated in by the NCP

Title	Date	Location	Size of Audience	Organiser	Target audience
Presentation during a class at the Vienna University for Economics and Business	06-May-2021	Online	10-50	Vienna University for Economics and Business	Students of the Vienna University for Economics and Business
Universal Periodic Review of Austria: Plenary Session with Civil Society	17-Sep-2021	Online	10-50	Austrian Federal Ministry for European and International Affairs	Government, NGOs
What contribution can quality labels make to combating labour exploitation along global supply chains?	30-Sep-2021	Online	10-50	NGO NeSoVe (Netzwerk Soziale Verantwortung)	Government, NGOs, Trade Unions
Presentation during a class at the Vienna University for Economics and Business	16-Sep-2021	Online	10-50	Vienna University for Economics and Business	Students of the Vienna University for Economics and Business

Source: NCP Reporting Questionnaire (2021).

Table A C.9. Promotional activities in 2020 organised by the NCP

Title	Date	Location	Size of audience	Organised or co-organised	Target audience
Kick-off Digitisation and RBC	27-Feb-2020	Federal Ministry for Digital and Economic Affairs	10-50	Organised	Business, Trade Unions, Civil Society, Government
Stakeholder Round Table: Business	30-Sep-2020	Online	<10	Organised	Business
Stakeholder Round Table: Civil Society	01-Oct-2020	Online	<10	Organised	NGOs, Civil Society, Academia
Stakeholder Round Table: Workers representatives, Trade Unions	01-Oct-2020	Online	<10	Organised	Workers Representatives, Trade Unions, Academia
Multi-Stakeholder Forum	22-Oct-2020	Online	10-50	Organised	Government, Trade Unions, Civil Society, Business
Exchange with Austrian export credit agency	22-Oct-2020	Online	<10	Organised	Bilateral Meeting

Source: NCP Reporting Questionnaire (2020).

Table A C.10. Promotional activities in 2020 participated in by the NCP

Title	Date	Location	Size of Audience	Organiser	Target audience
Hungarian NCP Meeting and RBC Conference	02-Sep-2020	Hungarian NCP	10-50	European Economic and Social Committee, Austrian Trade Union Federation, Austrian chamber of labour	Government, Trade Unions, Civil Society

Source: NCP Reporting Questionnaire (2020).

Annex D. Overview of specific instances handled by the NCP as the leading NCP

Table A D.1. Overview of specific instances handled by the NCP as the leading NCP

	Enterprise	Submitter	Host Country	Chapter (s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
1	H.C. Stark G,bH	Congo Mining Holding Ltd.	Democratic Republic of the Congo	IV, V, VI, VII	18-Nov-2004	N/A	14-Feb-2014	N/A	It was not possible to verify claims due to the internal situation in the DRC. The parties did not reach consensus and no statement was issued.	N/A
2	Global Sports Lanka	Metal, Textile and Food Trade Union on behalf of the International Textile Clothing and Leather Worker's Association (ITBLAV)	Sri Lanka	V	27-Mar-2006		17-Jul-2009	Recommendation	The parties did not reach consensus. The NCP issued recommendations.	N/A
3	Novartis	Gewerkschaft der Privatangestellten Druck – Journalismus – Papier	Austria	V	5-Feb-2008		17-Jul-2009	Recommendations	Parties reached consensus. The NCP made a final statement including recommendations.	N/A
4	KBA Mödling AG und Koenig Bauer AG	Gewerkschaft der Privatangestellten Druck, Journalismus und Papier sowie die Produktionsgewerkschaft	Austria	V	21-Jan-2014	N/A	14-Feb-2014	Agreement	Parties came to an agreement outside the NCP process. The NCP concluded the case.	N/A

	Enterprise	Submitter	Host Country	Chapter (s) of the Guidelines	Date of submission	Date of initial assessment	Date of conclusion	Outcome	Description	Follow-up
5	Andritz Hydro GmbH	Finance and Trade Watch Austria	Lao People's Democratic Republic	II, IV, VI	9-Apr-2014	22 May 2014	17 June 2017	Agreement, Recommendations, Follow-up, Policy Change	One submitter organisation left the procedure because a confidentiality agreement was signed by the parties. The remaining submitters and company came to an agreement and signed a joint statement. The NCP also issued a final statement and a follow-up statement.	October 2018
6	Telekom Austria AG	The Open Society Justice Initiative	Belarus	II, III, IV	16-Mar-2022	1 August 2023	25 July 2024	Agreement	Concluded with agreement. Parties signed further memorandum of understanding, seeking to further implement the Guidelines	planned
7	NGO	N/A	Hungary	IV, VIII	14-Apr-2023		06 July 2023	Not accepted	Specific instance filed with several NCPs, NCPs co-ordinated that Austrian NCP would support.	
8	OMV Aktiengesellschaft	Greenpeace, Fridays for Future			May-2024					
9	Austrian company	Private individual			Aug-2025					
10	Austrian Company	Private individuals			Sept-2025					

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Notes

¹ One expert at the time of the on-site visit was working as Deputy Head of the Department for Sustainability and OECD, the other was working in the Department for Sustainability and OECD as well as in the Department for Competition Policy.

² In the last five years, five parliamentary inquiries related to the work of the NCP or mentioned the NCP, available at www.parlament.gv.at/gegenstand/XXVI/AB/3830, www.parlament.gv.at/gegenstand/XXVII/AB/8445, www.parlament.gv.at/gegenstand/XXVII/AB/12840, www.parlament.gv.at/gegenstand/XXVII/AB/5482, www.parlament.gv.at/gegenstand/XXVII/AB/6887.

³ The Klagsverband is an umbrella organisation in Austria of NGOs litigating against discrimination, <https://www.klagsverband.at/english>.

⁴ To learn more about ICEP, see their webpage available here <https://icep.at/ueber-uns/> (accessed 24 April 2026).

⁵ The German translations of OECD publications available include: (OECD, 2018^[42]) https://www.oecd.org/de/publications/oecd-leitfaden-fur-die-erfullung-der-sorgfaltspflicht-fur-verantwortungsvolles-unternehmerisches-handeln_a0e31ac1-de.html, https://www.oecd.org/de/publications/oecd-leitfaden-fur-die-erfullung-der-sorgfaltspflicht-zur-forderung-verantwortungsvoller-lieferketten-fur-minerale-aus-konflikt-und-hochrisikogebieten_3d21faa0-de.html, https://www.oecd.org/de/publications/oecd-leitfaden-fur-die-erfullung-der-sorgfaltspflicht-zur-konstruktiven-stakeholderbeteiligung-im-rohstoffsektor_9789264285026-de.html, https://www.oecd.org/de/publications/praktische-ma-nahmen-fur-unternehmen-zur-bestimmung-und-beseitigung-der-schlimmsten-formen-der-kinderarbeit-in-lieferketten-fur-minerale_8ad1e62a-de.html, https://www.oecd.org/de/publications/oecd-handbuch-fur-umweltbezogene-sorgfaltspflichten-in-mineralischen-rohstofflieferketten_5dc13640-de.html, https://www.oecd.org/de/publications/oecd-fao-leitfaden-fur-verantwortungsvolle-landwirtschaftliche-lieferketten_9789264261235-de.html, https://www.oecd.org/de/publications/unternehmenshandbuch-zu-sorgfaltspflichten-im-kakaosektor_fe69b058-de.html, https://www.oecd.org/de/publications/oecd-fao-unternehmenshandbuch-zu-entwaldung-und-sorgfaltspflichten-in-landwirtschaftlichen-lieferketten_f7f03bfa-de.html, OECD Due Diligence Guidance for Responsible Supply Chains in the Garment and Footwear Sector, https://www.oecd.org/de/publications/verantwortungsvolles-unternehmerisches-handeln-fur-institutionelle-investoren_38efac8e-de.html, https://www.oecd.org/de/publications/die-erfullung-der-sorgfaltspflicht-fur-ein-verantwortungsvolles-firmenkredit-und-emissionsgeschäft_ac134bab-de.html.

