

WNCB recommendations to governments (including embassies), companies and international organisations for the elimination of child labour

The Work: No Child's Business Alliance (WNCB) is run by Save the Children Netherlands, UNICEF Netherlands and the Stop Child Labour Coalition, together with partner organizations and country offices in Cote d'Ivoire, India, Jordan, Mali, Uganda and Viet Nam. During our 5-year collaboration, we have joined hands to exchange our knowledge, network and methodologies to strengthen local, national and global initiatives in our joint fight against child labour.

To eradicate all forms of child labour we need to work together on all levels. Where possible and relevant, in areas where children are (also) working in (inter)national supply chains, we have implemented an integrated area-based and supply chain approach. This means that we engage with the respective (inter)national supply chain actors to take effective measures to ban child labour in their sourcing and production sites, while at the same time linking up to community-based efforts to tackle all forms of child labour, addressing the root causes and providing viable alternatives. We seek cooperation with national governments, who have an obligation to protect child rights and are key in setting and reinforcing relevant policies and legislation regarding child labour, responsible business conduct, education, youth economic empowerment, child protection and social security. With this integrated approach we aim at systemic and sustainable change, ensuring that children are not moving from one sector to another, and/or start working in hidden or worst forms of child labour. We aim at protecting and fulfilling the rights of all children, offering better perspectives of entering decent employment when they have the appropriate age and breaking cycles of poverty for next generations.

The latest global estimates (2020) indicate that the number of children in child labour has risen to 160 million worldwide – an increase of 8.4 million children in the last four years.¹ We will not meet the UN Sustainable Development Goal (SDG) 8.7 target of global elimination of child labour by 2025. With the end of the WNCB program in sight, and a global challenge to end child labour that is only worsening, we would like to share our lessons learned.

Recommendations to stakeholders

To be part of the solution, we call on each stakeholder to play their role within their area of impact and responsibility.

All stakeholders are encouraged to:

- Collaborate and implement an **integrated approach that combines a supply chain and an area-based approach** to address the root causes of child labour and promote sustainable alternatives that protect and fulfil children's rights.
- Ensure that responsible business practices to eliminate child labour and prevent adverse impacts on children's rights include the **higher tiers of global supply chains as well as lower tiers and informal work** in producing and sourcing countries.

¹ ILO and UNICEF, *Child Labour: Global estimates 2020, trends and the road forward*, New York, 2021.

Recommendations for governments of consuming and producing countries:

- Create a level playing field so **all private sector actors have the legal obligation** to implement human rights due diligence processes that meet the OECD guidelines and comply with EU and domestic legislation.
- Remain conscious that child labour mainly occurs outside of international supply chains, i.e., in domestic agricultural supply chains, informal sector and domestic work. This means that governments need to **look beyond regulating international supply chains** and invest in broader solutions such as area-based approaches to realise child labour free zones.
- Actively advocate for and showcase successes of **area-based approaches** (e.g. within EU, ILO, World Bank), working together with all relevant stakeholders in the area – teachers, local authorities, village leaders, employers, parents and children – to remove key barriers to the elimination of child labour and to protect the rights of all children, including the right to education.
- Develop and enforce relevant laws and make sufficient budget provisions for **quality education for all children, adequate child protection systems, and social services** that are accessible and child-friendly.
- Acknowledge **the importance of social norms** towards child labour and subsequently invest and act in changing these norms to support the elimination of child labour.
- Promote **inclusive, multiple-stakeholder dialogues** both in the EU and producing countries, ensuring the perspectives of businesses, communities, families including children, educators and other relevant stakeholders are taken into account in the development of policy measures to address the root causes of child labour and provide sustainable alternatives.
- Acknowledge **children as stakeholders who need to be consulted** either directly or indirectly when doing research, making policies and developing plans to eliminate child labour and fulfil children’s rights in supply chains and producing countries.

Recommendations to the European Union (EU):

- Strengthen alignment between the EU Corporate Sustainability Due Diligence Directive (CSDDD) and the (updated) OECD guidelines through accompanying measures, implementation guidelines and review, with particular attention to the personal scope and stakeholder engagement:
 - Personal scope: use the review to revise the employee or turnover thresholds, and pursue greater alignment with the OECD guidelines by ultimately ensuring that the Directive applies to all companies with international operations, business partners or value chains, irrespective of their size, sector, form, ownership or (group) structure, including the financial sector.
 - Emphasise the importance of stakeholder engagement *during all steps* of due diligence and require companies to prioritise engagement with affected stakeholders.
 - Clarify the expectations of enterprises to pay special attention to impacts on marginalised or vulnerable groups and to take account of the distinct and intersecting risks rightsholders may face as a result of their individual characteristics.
- Encourage EU Member States and EU companies to work with partner country governments, the local private sector and local stakeholders on addressing the root causes of adverse human rights impacts, including child labour.
- Acknowledge that supply chain due diligence needs to be complemented by an area-based approach to tackle the root causes of child labour; increase funding and support for area-based

approaches that address root causes of child labour at the community level and invest in viable alternatives.

- Encourage collaboration between EU companies and local stakeholders in production countries to implement holistic solutions.
- Ensure complete and timely transposition and implementation of EU Corporate Sustainability Due Diligence Directive.
- Extend the obligations in the CSDDD to the EU's own purchasing and procurement policy and practices (i.e. investments and bidding contracts), whereby transparency, a code of conduct, and concrete action to prevent and eliminate child labour are essential prerequisites for funding;
- Ensure that third-party audits go beyond checking off compliance boxes, and include field observations and wider stakeholder engagement to achieve visibility on the way human rights due diligence is implemented and respected.

Recommendations to Dutch Embassies and EU Delegations in Producing Countries:

- Work with local stakeholders, such as governments and communities, to support area-based approaches. Embassies and delegations should highlight successful examples and advocate for their implementation.
- Provide guidance to Dutch and EU companies operating in the host country on conducting due diligence in line with the OECD guidelines (and EU CSDDD).
- Facilitate and participate in dialogues that bring together local authorities, communities, and businesses to address the systemic drivers of child labour. Ensure that all perspectives, including those of children, are considered in policy-making.
- Facilitate partnerships between Dutch companies and local stakeholders in host countries to implement holistic, area-based solutions to child labour.
- Establish clear protocols for engaging with and protecting human rights defenders who raise concerns about child labour and other human rights violations, also in the context of business operations.
- Promote the importance of allocating adequate resources to education and child protection in partner countries.

Recommendations for Downstream Companies in the Netherlands and the EU:

- Ensure that human rights due diligence (HRDD) includes child-sensitive mechanisms at all stages, particularly in risk identification, stakeholder engagement, and remediation. This includes consulting children and their representatives and developing accessible, child-sensitive grievance mechanisms.
- Establish company policies that uphold the rights of children and adhere to international standards, such as the ILO Conventions 138 and 182, the UN Convention on the Rights of the Child, the UN Guiding Principles on Business and Human Rights, the OECD guidelines for multinational enterprises and the Children's Rights and Business Principles. These policies should be embedded across all company operations and suppliers.

- Invest in sustainable practices that support adult workers, ensuring they receive fair wages and work under decent conditions. This transition allows children to exit the workforce and return to school while ensuring families remain economically supported.
- Extend due diligence processes to include suppliers at all levels, particularly in lower tiers and informal workplaces where child labor risks are heightened. This includes implementing strong age-verification processes in sourcing countries and preventing child labor displacement to informal work settings.

Recommendations for Upstream Companies in Production Countries (Local Private Sector):

- Local suppliers should implement reliable age-verification processes as part of their recruitment and hiring practices to prevent the employment of underage workers in their operations.
- Partner with local governments and NGOs to support education and training programs that provide children with learning opportunities, thereby reducing the need for child labour and strengthening community resilience.
- Uphold the responsibility to protect and respect children's rights, as guided by national and international frameworks, by not employing or using child labour and ensuring that working conditions are safe and fair for all workers, particularly adults who may otherwise rely on their children's earnings.
- Participate in local initiatives that bring together businesses, civil society, and government agencies to address the challenges of child labour and create pathways for sustainable development.