

Conference Report; East & Horn of Africa Business and Human Rights Dialogue 2026 (10-11 June, Nairobi)

The 2nd East & Horn of Africa Business and Human Rights Dialogue took place 10 and 11 June in Nairobi under the theme **“Beyond Compliance: Strengthening Accountable and Rights-centred Supply Chains”**. The dialogue was co-convened by DanChurchAid, United Nations Development Programme, the Office of the United Nations High Commissioner for Human Rights, the Network of African National Human Rights Institutions & Global Compact Network Kenya in partnership with ACT Alliance, the African Coalition for Corporate Accountability, Danish Industries East Africa, the Danish Family Planning Association, Centre for Education Policy and Climate Justice, Pamoja Trust, Resource Rights Africa and Witness Radio.

The dialogue was guided by the following objectives:

1. To assess and catalyse **progress on adopting and implementing Business and Human Rights frameworks** on national and regional level focused on measurable and concrete action under the three UNGP pillars. The dialogue and workshop will focus on different avenues including NAPs, other BHR-related policies, EU regulation and trade deals relevant to the region.
2. To encourage **peer-learning and multistakeholder dialogue** amongst governments, national human rights institutions, businesses and civil society organisations, human rights defenders, trade unions and academia.
3. To present **evidence from sector specific issues in land-based investments**, including agri-production, extractives and energy infrastructure as well as tools and positive experiences and opportunities to improve responsible business conduct that benefits businesses and rights holders, emphasising ‘the business case of human rights’.
4. To **advance practical models and tools for due diligence** (including heightened due diligence) that highlight the lived challenges of producers, communities and consumers and that strengthens protection of most-at-risk groups such as HRDs, women and children.

The dialogue was attended by 120 participants representing key private sector, civil society, church, academia, government, national human rights institutions, UN & EU actors from across Djibouti, DRC, Ethiopia, Kenya, Nigeria, Somalia, South Africa, South Sudan, Uganda, Tanzania, and Denmark. The dialogue was also livestreamed and allowed for additional online participation during select sessions. Through five plenary discussions, a high-level keynote, two keynote addresses, and twelve breakout sessions and thematic deep dives, **the programme examined a broad range of issues, including responsible business conduct, human rights due diligence, just transition pathways, land-based investments, extractives, agribusiness, conservation, supply chain accountability, policy development, youth participation, and the role of faith actors in advancing rights-based governance**. Across the sessions, a recurring focus was how businesses, governments and other stakeholders can move beyond compliance towards more inclusive, accountable and transformative approaches that strengthen resilience, support

sustainable development, and ensure that economic growth is aligned with respect for human rights. The following summarises the key recommendations, commitments, assessments, and guidance shared by the speakers and participants;

Key Statements and Recommendations

The Chairperson of **the UN Working Group on Business and Human Rights**, Prof. Damilola Olawuyi, called for the finalisation of the African Union Strategy on Business and Human Rights and also called on the court of East African Court of Justice to adopt guidance on human rights in line with the EU court.

Matthew Brooke, a representative from **the Delegation of the European Union to Kenya**, highlighted that irresponsible investments are not good and sustainable investments and that there is need to continue to document rights abuses. He highlighted that civil society is increasingly positioned as both a critical risk mitigation partner and a bridge to communities, helping ensure investments are not only viable, but socially grounded and sustainable. At the same time, the need for fairness, adjustment support, and access to clear compliance information is central to making these transitions work in practice.

Gilbert Sebihogo, Executive Director, **Network of National African Human Rights Institutions (NANHRI)** underlined that existing African and global sustainability framework, together with evolving market trends, present an opportunity to drive structural transformation. Business models that embed environmental and social sustainability at the core of their operations can generate positive impacts for workers, communities, consumers, the climate and the environment.

Omer Al-Shareqi, Business and Human Rights Focal Point, **Office of the United Nations High Commissioner for Human Rights (OHCHR)** encouraged the continued growth of sub-regional business and human rights dialogues across Africa as important building blocks of the continent's broader BHR architecture. By bringing regional experiences and lessons into continental processes and supporting implementation of commitments such as the Nairobi Declaration, the platforms can help strengthen more informed, inclusive and action-oriented discussions, as well as accountability and implementation.

Judy Njino, the Executive Director of **Global Compact Network Kenya** stressed that human rights and social sustainability are increasingly becoming part of the organising logic of business itself, shaping how competitive, resilient and future-ready companies will be built in East Africa over the next decade.

Madelena Monoja, Deputy Resident Representative, **United Nations Development Programme (UNDP)** explained how subregional dialogues holds the potential to meaningfully feed into regional and international discussions and creating an enabling environment for implementation of key frameworks and guidelines.

Karen Poore, the Country Director for **DanChurchAid Kenya**, underlined the benefits of forming partnerships across private sector and civil society to ensure that affected stakeholders are

meaningfully engaged and that inclusive and innovative business models can support building more resilient communities.

Status and Progress of Business and Human Rights Policy incl. National Action Plans

Key Regional Trends

Across the presentations, several common themes emerged. Countries highlighted the importance of inclusive and participatory NAP development processes, involving businesses, workers, affected communities, civil society organisations, government agencies and national human rights institutions. Many also emphasised the **need to strengthen awareness and capacity on business and human rights among both rights holders and duty bearers, and ensuring effective access to remedy which remains a challenge across. Cross institutional engagement as a key enabler also came up from several representatives.** Emerging issues, including digitalisation and technology-related risks, migration, climate change and just transitions, are increasingly being incorporated into national policy discussions. At the same time, resource constraints, institutional coordination challenges and limited awareness continue to be recurring barriers to effective implementation. Participants also highlighted the value of regional exchange and peer learning, including opportunities to share experiences and approaches related to implementation, monitoring, data collection and impact measurement.

Moving NAPs to the next level

Kenya, the first country in Africa to adopt a National Action Plan, and the host of the dialogue, is in the process of reviewing its National Action plan to be able to start the second phase of implementation. As part of the review and extension of the National Action Plan (NAP), additional focus areas relating to environmental sustainability and just transitions are being incorporated. Baseline assessments are currently being undertaken on a range of thematic areas, including state-business nexus and emerging issues related to technology and labour. Key areas of focus include land and large-scale investments in agriculture, extractives and infrastructure; labour conditions and gaps in worker protection; risks associated with the largely unregulated gig and digital economy; gender-based violence and harassment in the workplace; and the rights of migrants and refugees who increasingly form part of the workforce.

During the dialogue, in addition to the above priorities, the following recommendations and perspectives were shared; the need to improve access to remedy by increasing awareness of available grievance mechanisms, strengthening links between formal and community-based dispute resolution processes, and encouraging early dialogue to prevent disputes from escalating. Further, the **need for stronger implementation and accountability measures, including more systematic business approaches to social risk management, robust monitoring frameworks with clear indicators, greater involvement of county governments, and enhanced collaboration between government, business and civil society** was stressed. They also highlighted the importance of

anticipating emerging challenges, including the human rights implications of new technologies and artificial intelligence.

Since the launch of the NAP in **Uganda** in 2021, the Ministry of Gender, Labour and Social Development has led implementation efforts, including awareness-raising among businesses, government institutions and civil society, with a **focus on demonstrating that respect for human rights creates value for both businesses and communities**. To support implementation, a multi-stakeholder coordination committee has also been established, bringing together government ministries, civil society organisations, the private sector and development partners. Members regularly report on progress against NAP commitments as well as implementation challenges and gaps. The Ministry is also developing an interactive monitoring and reporting system through which communities and civil society organisations can report business-related human rights abuses and facilitate referrals to relevant authorities. Regulatory reforms are ongoing, including the proposed Social Impact Assessment and Accountability Bill, while guidelines have been developed to strengthen the assessment of human rights risks in public projects. Looking ahead, the government has commissioned a review of the current NAP to inform the development of a second-generation NAP, which is expected by the end of 2026 or in early 2027.

Inclusive Consultation for Gap Identification and Strategic Action

Representative from the Commission for Human Rights and Good Governance (CHRAGG), **Tanzania**, highlighted significant progress since the 2023 regional dialogue, when the National Action Plan (NAP) was still at the conceptual stage. CHRAGG was subsequently mandated to coordinate the process through the Ministry of Constitutional and Legal Affairs. Extensive consultations with government, businesses, workers, civil society and affected communities informed a national baseline assessment and the establishment of thematic working groups covering extractives and energy, tourism, manufacturing and processing, digitalisation, and trade, commerce and finance. Additional assessments focused on child rights and business. These processes helped identify key priorities for the NAP, including labour rights, environmental protection, land and natural resources, human rights due diligence, private security, and strengthened oversight mechanisms.

It was noted that several sectors continue to present heightened human rights risks. **In extractives, energy, agriculture and infrastructure projects, concerns include land dispossession, environmental degradation and insufficient consultation of affected communities. In agriculture, labour rights challenges and pressures on local communities linked to large-scale estates were highlighted, while manufacturing and tourism sectors face recurring issues related to working conditions, contracts, working hours and workplace harassment.** To better understand these challenges, CHRAGG has undertaken targeted investigations into labour rights conditions in the tea and coffee sectors, manufacturing and processing industries, and the tourism sector. The findings have informed recommendations and proposed measures under the draft NAP. The draft has now been submitted to the relevant ministries and is in the final stages of coordination and approval. A key challenge throughout the process has been limited awareness and understanding of business and human rights among stakeholders.

A representative from the Ethiopia Human Rights Commission (EHRC) shared updates on the country's business and human rights agenda. Following recommendations from the Universal Periodic Review process, **Ethiopia** initiated the development of a National Action Plan (NAP) in 2024. Horticulture, coffee and textiles have been identified as priority sectors, while the Commission's

Socio-Economic Rights Department has undertaken efforts to strengthen alignment between business practices and international human rights standards. **Drawing on lessons from countries such as Ghana, Tanzania and Kenya, the process has prioritised broad stakeholder engagement, including businesses, workers, civil society organisations, government ministries and the national human rights institution.** A national baseline assessment was conducted to identify legal and practical gaps, complemented by regional and thematic consultations across the country, including some undertaken in partnership with UNDP.

A key challenge identified has been limited awareness of business and human rights among both rights holders and businesses, including knowledge of existing labour laws and the UN Guiding Principles on Business and Human Rights. Participants emphasised the importance of enabling rights holders to understand and claim their rights, while ensuring businesses are aware of their responsibilities. The Commission also highlighted persistent perceptions that human rights and economic development are competing objectives, stressing instead that respect for human rights should be viewed as a business opportunity rather than a cost. Other challenges include limited institutional coordination and resource constraints within government agencies. Nevertheless, the NAP process has helped strengthen dialogue among stakeholders and establish a foundation for more coordinated action on business and human rights in Ethiopia.

Business and Human Rights as distinct Policy Areas

A Representative from **Djibouti's** National Human Rights Commission emphasised the importance of establishing business and human rights as a distinct policy area in order to ensure a comprehensive and coherent approach aligned with the UN Guiding Principles on Business and Human Rights (UNGPs). The development of a National Action Plan (NAP) has commenced with the completion of a national baseline assessment, which identified key strengths and gaps relating to labour rights and migration, access to remedy, the rights of persons with disabilities, and the effectiveness of oversight and monitoring mechanisms.

It was underlined that Djibouti's economy is heavily influenced by port and logistics services, infrastructure development, construction, and the growing tourism and hospitality sector. Several of these sectors have been identified as priority areas for the NAP due to their significant workforce and the prevalence of issues related to occupational health and safety, labour rights, and the protection of vulnerable groups, including persons with disabilities. **A distinctive feature of the process has been its focus on translating identified risks into concrete preventive measures. Proposed actions include strengthening labour inspections, activating labour and health commissions, establishing internal grievance and complaint-handling mechanisms within companies, and expanding training programmes for both employers and workers.**

A key message emerging from the discussion was that business and human rights efforts should not be limited to responding to violations that have already occurred. Rather, in line with the concept of human rights due diligence, greater attention should be paid to identifying and addressing risks before harm occurs through effective stakeholder engagement and the implementation of preventive measures. Participants noted that **the NAP can serve as an important tool for shifting from a logic of reaction to a logic of prevention.** This perspective was considered particularly relevant for East Africa, where increasing levels of investment and major infrastructure projects are creating both opportunities and heightened risks. It was stressed that the adoption of a NAP should not be viewed

as the end of the process, but rather as the beginning of a longer-term effort to translate commitments into meaningful action by both public institutions and businesses.

Assessment of Sector Specific Issues in Land Based Investments

This section highlights key business and human rights challenges and opportunities across sectors discussed during the dialogue. While the specific risks and pathways to responsible business conduct vary, participants consistently emphasized the importance of meaningful stakeholder engagement, stronger accountability and grievance mechanisms, and approaches that prioritize prevention, participation and access to remedy. Sector-specific discussions further underscored the need to translate due diligence and sustainability commitments into tangible outcomes for workers, communities and other rights holders.

Agribusiness

The agribusiness sector faces a range of salient business and human rights risks, particularly related to labour rights, land access and use, environmental impacts, and the rights of local communities affected by large-scale agricultural investments. Workers, smallholder farmers, and rural communities often bear the greatest burden where weak policy implementation, limited enforcement, and inadequate accountability mechanisms allow harms to persist. Labour rights challenges, pressures on communities linked to large-scale estates, and barriers to effective remedy remain recurring concerns across the sector.

Participants emphasized that access to remedy begins long before a grievance is filed and depends on effective social safeguards that prevent harm, ensure meaningful participation, and addressing concerns before they escalate into disputes. However, many rights holders face significant obstacles in accessing remedy, including limited awareness of available mechanisms, lack of trust in institutions, fear of retaliation, and difficulties navigating formal complaint systems. These challenges can be particularly acute for women, youth, workers, and smallholder farmers, whose voices are often underrepresented in decision-making and accountability processes.

A key opportunity for advancing responsible business conduct is to strengthen inclusive and community-driven grievance and accountability mechanisms that build on existing local structures and reflect the realities of affected stakeholders. Further, the importance of a multi-door approach to justice that combines judicial, administrative, customary, community-based, and non-judicial mechanisms was highlighted. While due diligence requirements and sustainability standards can help drive improved practices, their effectiveness depends on meaningful stakeholder engagement, stronger local accountability systems, civic education, and continuous monitoring. Ultimately, improved access to remedy requires moving beyond compliance towards approaches that prioritize prevention, participation, accountability, and tangible outcomes for rights holders.

Conservation & Tourism

The sectors of conservation and tourism were brought up several times during the dialogue. Key concerns shared include inadequate consultation, recognition of Indigenous and community land rights, inequitable benefit-sharing, and limited community influence over decisions that directly

affect their livelihoods, land and resources. At the same time, competition over natural resources can create tensions between conservation objectives and local livelihood needs, increasing the risk of adverse impacts if trade-offs are not managed inclusively. Beyond community impacts, ew such as tourism also face recurring labour rights challenges, including poor working conditions, insecure contracts, excessive working hours, workplace harassment, and insufficient worker representation. In countries with large tourism workforces, issues related to occupational health and safety were highlighted as a significant concern.

There are important opportunities to strengthen outcomes by adopting a rights-based and responsible business conduct approach. This includes ensuring meaningful participation and shared decision-making, integrating Indigenous and local knowledge into project design, and establishing transparent governance and grievance mechanisms. Capacity strengthening, access to finance, and support for community-led institutions can further enable co-leadership and equitable benefit-sharing. Ultimately, conservation efforts are more likely to deliver sustainable environmental, social, and economic outcomes when they place human rights, decent work, community agency, and accountability at the centre of decision-making.

Energy and Extractives

The extractive and mining sectors face heightened human rights risks related to land acquisition, environmental degradation, conflict, security-related impacts, and weak governance, making proactive and context-specific human rights due diligence particularly important. Participants highlighted that due diligence too often becomes a compliance exercise rather than a tool for preventing harm, with engagement focused on government actors or community leaders rather than meaningful consultation with affected communities. Particular concerns included inadequate transparency, weak monitoring and enforcement, limited public communication, and insufficient mitigation and remediation measures for environmental and social impacts.

A key recommendation was to move from voluntary approaches towards stronger legal requirements, enforcement, and heightened due diligence in high-risk environments, including areas affected by insecurity and conflict. It was emphasized that due diligence should be grounded in meaningful stakeholder engagement, with communities actively participating in consultation, consent processes, and decision-making rather than being treated as passive recipients of information. Governments were seen as playing a critical role in both preventing harm and responding to violations through effective oversight, public disclosure of monitoring results, enforcement of sanctions, and ensuring access to remedy.

At the same time, participants noted that effective due diligence can be a force for transformation rather than simply a risk-management tool. When implemented meaningfully, it can strengthen accountability, protect brand and reputation, improve operational resilience and sustainability, create competitive advantage, and foster more stable relationships between companies and affected stakeholders. Realizing this potential requires shifting from compliance towards genuine engagement, transparency, and a focus on tangible outcomes for rights holders.

Emerging Areas

Emerging areas such as technology and the gig economy featured prominently in discussions on the future of business and human rights. As digital platforms, artificial intelligence and platform-based work continue to expand, participants highlighted the need for businesses and public institutions to

better identify, and address risks related to workers' rights, privacy, decision-making, discrimination, data protection and access to remedy. Ensuring that innovation is accompanied by appropriate safeguards, oversight and accountability mechanisms was seen as essential to protecting rights holders and promoting inclusive and responsible digital economies.

Widening participation and representation

Faith Actor Engagement

One indication of the evolving business and human rights (BHR) landscape is the growing role of faith actors. While faith-based organisations have long worked on social justice, labour rights and accountability issues, they are increasingly contributing to BHR policy discussions, stakeholder engagement and access to remedy efforts.

At the East & Horn of Africa Business and Human Rights Dialogue, discussions facilitated by ACT Alliance highlighted how faith actors can serve as trusted intermediaries, particularly where communities face barriers to participation or have limited access to formal institutions. Their close ties to local communities position them to support dialogue, raise awareness of rights and help connect affected stakeholders with grievance and remedy mechanisms.

These discussions inform ongoing work by FECCLAHA, Swedwatch and ACT Church of Sweden on community-driven remedy in extractive supply chains. A case featured later in this publication, drawing on the guide *Restoring Faith in Remedy*, illustrates how faith actors can help address barriers to remedy and strengthen accountability through collaboration with civil society organisations, legal practitioners and trade unions.

Recommendations from Youth Alliances and Networks

Youth participation emerged as a key theme throughout the dialogue, reflecting the growing recognition of young people as central actors in the business and human rights agenda. In a session hosted by the Pan-African Youth Alliance on Business and Human Rights, the need to make BHR concepts and frameworks more accessible through education, entrepreneurship programmes and community engagement platforms, while calling for youth engagement to move beyond ad hoc consultations towards institutionalized and meaningful participation in decision-making processes were emphasised. With nearly 70% of Africa's population under the age of 35, discussions underscored that young people are not only future leaders but also today's workers, entrepreneurs, innovators and consumers, making their inclusion essential to shaping responsible business conduct and accountability efforts.

The Private Sector Perspective

Private sector participants emphasized that responsible business conduct is increasingly becoming a prerequisite for competitiveness, market access, investment and long-term business resilience rather than a stand-alone compliance obligation. Discussions highlighted how investments in worker wellbeing, environmental performance and community engagement can help reduce operational risks, strengthen stakeholder trust and create long-term business value.

It was also noted that there is a growing expectations from buyers, investors and regulators for greater supply chain transparency, responsible sourcing and effective human rights due diligence. Meeting these expectations will require practical collaboration between businesses, governments, financial institutions and business associations to build capacity, support implementation and strengthen labour and human rights standards across value chains. At the same time, there was a strong call to embed human rights due diligence more deeply into core business decision-making, with greater emphasis on meaningful stakeholder engagement, effective remedy and continuous improvement.

Evaluation of the Conference

Feedback from participants in the East and Horn of Africa Business and Human Rights Dialogue 2026 was overwhelmingly positive, with most respondents rating the dialogue highly across its core objectives and highlighting the relevance of the discussions, the quality of the panel sessions, and the value of the breakout and country caucus discussions. Participants particularly appreciated the multi-stakeholder nature of the event, which brought together representatives from government, civil society, businesses, academia, faith-based actors, and communities to share experiences, build partnerships, and explore practical solutions to business and human rights challenges in the region. Key recommendations for future dialogues included allocating more time for interactive discussions and networking, which proved to be beneficial for developing meaningful tracks of action to follow the dialogue. Organisers were also encouraged to strengthen participation of grassroots communities, women and youth, increase engagement with government and private sector actors, and establish clearer follow-up mechanisms to translate recommendations into action.

The feedback and reflections shared by participants provide valuable guidance for future engagement and will help inform the ongoing development of the dialogue to ensure it remains relevant, inclusive, and responsive to the priorities of stakeholders across the region.

Practical models and tools for due diligence presented during the dialogue

- [Community-Investor Framework for Kenya's Drylands](#) (Landesa)
- [EU Due Diligence Navigator for Partner Countries](#) (European Commission, International Partnerships)
- [Heightened Human Rights Due Diligence: A Practical Guide for Business in Conflict-Affected and High-Risk Contexts](#) (UNDP)
- UN Working Group on Business and Human Rights [report on Agribusiness, food security and human rights](#)