Contribution to BHRC research on Human Rights Defenders

The Business and Human Rights Centre (BHRC) is reaching out to CGF as part of new research on how companies, multistakeholder initiatives and industry associations are implementing their policy commitments and/or guidance to not tolerate or contribute to attacks against Human Rights Defenders (defenders). Over the past 10 years, there has been notable progress with companies adopting policy commitments to not tolerate attacks on defenders – from 0 in 2015 to at least 51 in 2025, based on our research. At the same time, attacks on defenders raising concerns about business related human rights risks and harms continue unabated – with more than 7,000 reported attacks recorded by BHRC since 2015 including almost 800 last year – showing the vital importance of moving beyond policy commitments to effective implementation.

Invitation to participate in the survey

To help us better understand policy implementation experiences and emerging good practices, we would be grateful if you could respond to the following six questions. Your responses to the first four questions will be shared publicly on the Business and Human Rights Centre's website along with other company survey responses received. Responses to the additional two questions will be confidential, seen only by BHRC team members, and will inform an overall analysis of the survey responses.

1. Please provide one or two concrete examples that demonstrate how CGF has supported, encouraged, or influenced member companies to implement the CGF's Best Practice Note for Business on Human Rights Defenders?

The CGF collaboratively developed the Best Practice Note alongside its Human Rights and Forest Positive Coalitions with dialogue with key civil society stakeholders. To facilitate its adoption, the CGF provided members with a dedicated communications and promotional kit containing key messages, proof points, and social media assets. These resources enable member companies to easily amplify the guidance, integrate Defender considerations into their corporate sustainability reports, and align their internal due diligence policies with international standards, if they wish to.

Additionally, the CGF hosted a specialised "Expert Series" webinar focused on human rights defenders and extended access to remedy, to bring our 400+ member companies together, share practical case studies, and discuss real-world implementation. This interactive session provided actionable guidance on embedding Defender protections into human rights due diligence, strengthening supplier engagement, and improving grievance mechanisms, thereby fostering peer learning and driving industry-wide progress.

This topic was then brought into the Sustainable Retail Summit 2026 – a CGF conference bringing together C-suite executives, directors, and sustainability professionals across 150+ global retail, manufacturing, and consumer goods companies to drive actionable industry ESG strategies. At SRS 2026, drawing insights from the CGF's Best Practice Note for Business on Human Rights Defenders, industry experts shared actionable approaches for strengthening supplier engagement, enhancing grievance mechanisms, and implementing early warning systems that identify and address threats to defenders before they escalate. Participants learnt how to integrate these safeguards into their operations while supporting sustainable sourcing and responsible business practices across global value chains.

The Best Practice Note was also promoted in several of CGF's newsletters, including our quarterly newsletter Positive Actions, going out to over 10,000 contacts to highlight implementation steps and encourage engagement with industry leaders beyond human rights or compliance teams.

As a result of these efforts some members have taken actions to improve the access to and the processes of their grievance mechanisms. As recorded in CGF's 2025 " Tackling Forced Labour through HRDD" Report, examples of these include:

- Updating of human rights policies and suppliers codes of conduct, to further define commitments as well as its expectations for suppliers, and other business partners.
- Disseminating the Human Rights Policy to raise awareness and reinforce commitment
- Mapping languages spoken by workers, in particular contracted workers, to develop adequate materials that improve their knowledge and access to grievance mechanisms.
- Moving beyond traditional hotspots and applying a context-specific lens to social assessments that can flag existing human rights issues.
- Establishing and equipping a network of local Business & Human Rights Leads to drive action on the ground
- Training employees and managers on identifying and preventing forced labour
- Introducing accessible grievance mechanisms
- Report regularly online on progress on grievance resolution, policy implementation and impact.

2. What steps does CGF take to ensure that Human Rights Defenders, affected communities, and Indigenous Peoples are aware of the commitments and expectations set out in the Best Practice Note for Business on Human Rights Defenders? Please provide an example of how these commitments have been communicated in practice.

As a business-to-business network for retailers and manufacturers, the Consumer Goods Forum (CGF) does not directly manage operational grievance mechanisms or engage with grassroots Human Rights Defenders and affected communities. Instead, we cascade best practice through our member network, equipping the individual companies who hold direct supply chain relationships to implement these commitments on the ground. We actively engage our members, via the examples given in Q1.

In particular, in the process of drafting the Best Practice Note on Human Rights Defenders, CGF engaged actively with civil society organisations representing human rights defenders globally, to capture their perspectives and consider them as valuable input in the drafting of the note. Stakeholder perspectives submitted, were published in whole and without amendment as an annex to the Best Practice Note.

3. What steps does CGF take to ensure that member companies understand the expectations and commitments outlined in the Best Practice Note for Business on Human Rights Defenders?

The CGF provides a pre-competitive space, bringing members and stakeholders together for essential conversations. All our programs are voluntary, transparent, and provide tools for companies to compete independently.

As individual businesses, our members must make their own judgments on how to operate, and we are not able to dictate how individual companies do business.

It is with this direction that the best practice note does not relay expectations or commitments. It is a resource for companies to use as inspiration and reference to what they can put in place in their own companies.

4. What mechanisms does CGF have in place for Human Rights Defenders or affected community members to safely raise concerns, without fear of retaliation, regarding the conduct of your members? How are such concerns received, assessed, and addressed, including any processes for engaging with the relevant member(s)?

The CGF is a pre-competitive membership organisation. We create a space for retailers and manufacturers to convene and collaborate.

We are committed to compliance with all applicable laws and have robust antitrust compliance measures in place.

With this in mind you'll appreciate that CGF does not coordinate such a mechanism for reporting human rights concerns regarding the operations of our individual members. We establish voluntary frameworks and guidance that serve as reference for companies to be better equipped when setting up grievance mechanisms or responding to specific complaints. As part of our tools, we support and encourage

the establishment of adequate grievance mechanisms by our members. In fact, from a review of publicly available information we can assess that all the members of the human rights coalition maintain direct operational grievance mechanisms, and a majority of the companies extend it to their suppliers. A greater challenge comes with defender oriented and external grievance mechanisms, including to Human Rights defenders.

As a result of the need to strengthen the external dimension of grievance mechanisms, members started to collaborate on key social grievances where challenges were shared across the supply chain, in order to pilot and implement some of the methodologies outlined in the Best Practice Note.

If CGF were to receive such information, we would communicate the relevant information to the companies involved. If several companies, members of CGF, are connected to the concerns raised, CGF can convene a safe pre-competitive space for discussion about addressing the concerns. In all cases, members remain free to conduct their own assessment and must make their business decisions individually.