



World Animal Protection vs. Rabobank

Date: 23 April 2026

Initial Assessment

The objective of the initial assessment process under the Implementation Procedures is to determine whether the issues raised in the specific instance warrant further examination. If so, the NCP will offer or facilitate access to consensual and non-adversarial procedures, such as dialogue, mediation or conciliation (e.g. ‘good offices’) to the relevant parties. As specific instances are not legal proceedings and NCPs are not judicial bodies, NCPs cannot impose sanctions, directly provide compensation or compel parties to participate in a conciliation or mediation process.

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Executive summary

On 2 October 2025, the Dutch National Contact Point for Responsible Business Conduct (NCP) received a notification of a specific instance from World Animal Protection the Netherlands (hereinafter WAP or the notifying party) with regard to an alleged violation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereinafter the Guidelines) by Rabobank. Rabobank is a Netherlands-based financial institution.

According to WAP, Rabobank has repeatedly breached the Guidelines. The notifying party alleges that Rabobank has failed to address adverse welfare impacts on farmed animals, as a result of providing loans and security underwritings to enterprises in the supply chain of industrial animal production. The issues raised in the submission concern an alleged violation by Rabobank of the Guidelines' Chapters on General Policies (Chapter II) and Environment (Chapter VI).

Rabobank recognizes the need to address concerns regarding animal welfare, yet at the same time indicates that they can only do so within the limitations of the role that a bank has in relation to individual clients and sectors in the real economy. According to Rabobank, the extent of engagement and the leverage on clients is often dependent upon the market contexts in which clients operate, and a legal landscape which is fragmented. Rabobank is willing to resume a constructive dialogue with WAP, facilitated by the NCP, to exchange knowledge on animal welfare while recognising and respecting each other's respective roles. Rabobank has further emphasised that its willingness to engage in dialogue does not imply any acknowledgement of a breach of the Guidelines.

Brief overview of the timeline

On 11 November 2025 the NCP had a first meeting with the notifying party. On 12 November 2025, the NCP had a first meeting with the enterprise. The NCP received the initial written response from Rabobank on 15 December 2025. The NCP shared the draft Initial Assessment with the parties on 27 February 2026 for comments within two weeks. The Initial Assessment was published on the NCP website on 23 April 2026.

Conclusion

The NCP concludes that the notification concerning Rabobank **warrants further examination** based on the following criteria:

- the identity of the party concerned and its interest in the matter;
- whether the issue is material and substantiated;
- whether the enterprise is covered by the Guidelines;

- whether there seems to be a link between the enterprise's activities and the issue raised in the specific instance;
- the extent to which applicable law and/or parallel proceedings limit the NCP's ability to contribute to the resolution of the issue and/or the implementation of the Guidelines;
- whether the examination of the issue would contribute to the purposes and effectiveness of the Guidelines.

Below it is explained why, in the NCP's opinion, these criteria have been met.

This decision does not mean that the issues raised have been given final consideration and does not imply any finding as to whether or not the enterprise has acted in accordance with the Guidelines.

Substance of the submission (facts presented) and the enterprise's response

Summary of the submission

WAP alleges that Rabobank has financed enterprises in the industrial animal production value chain, including large internationally operating meat companies, which, according to WAP, are known for severe animal welfare violations, such as overcrowded facilities, routine mutilations, and inhumane slaughter practices. Therefore, the notifying party argues that Rabobank is in breach of all 'Five Freedoms'¹ of the World Organisation for Animal Health Terrestrial Code (TAHC), as referred to in the OECD Guidelines. WAP concludes that Rabobank cannot provide data on how it monitors, prevents and mitigates adverse impacts on the Five Freedoms.

The notifying party further criticizes Rabobank for not having aligned their animal welfare due diligence with the Guidelines. It claims Rabobank has failed to take meaningful steps to identify, prevent, or mitigate profound and large-scale adverse animal welfare impacts in its finance portfolio. Despite sustained efforts by WAP since 2016, the notifying party has not observed any progress. On the contrary, WAP believes that Rabobank has downgraded its animal welfare policy in February 2025.

WAP argues that Rabobank's relation to the adverse impact has moved from 'directly linked' to 'contributing'. WAP reasons that the enterprise has known (or should have known) for a long time about adverse impacts on animal welfare caused by its business activities. Nevertheless, it has continued and even expanded such activities.

¹ The five freedoms are: Freedom from hunger and thirst, freedom from discomfort, freedom from pain, injury, or disease, freedom to express normal behavior, freedom from fear and distress.

Lastly, the complainants allege that Rabobank is not transparent about its membership of certain lobby groups and their lobby objectives. These lobby groups are considered by WAP to actively work to prevent or delay improvements in animal welfare.

In sum, WAP states that Rabobank has violated the following sections of the Guidelines in particular:

- Chapter VI (Environment), commentary 85
- Chapter II (General Policies), commentary 6
- Chapter II (General Policies), paragraphs 11, 12 and 13

World Animal Protection requests that Rabobank brings its conduct in line with the Guidelines by undertaking the following actions:

- Strengthening its animal welfare policy to prevent and mitigate the most severe adverse animal welfare impacts in its portfolio.
- Publicly disclosing the concrete due diligence procedures and measures it takes with regard to animal welfare, based on credible performance data.
- Establishing and implementing a transparent and robust animal welfare monitoring and reporting system across its financial services portfolio.
- Providing specific information on how Rabobank uses its leverage to improve animal welfare practices among its clients, including the results of these efforts.
- Terminating financial relationships with companies that are unwilling or unable to prevent or mitigate adverse animal impacts, starting with high-risk clients.
- Refraining from supporting, directly or indirectly, lobbying practices or affiliations with industry groups that obstruct or undermine progress on animal welfare.

Enterprise's response

Rabobank appreciates the concerns that WAP has expressed with respect to animal welfare. Rabobank is a globally operating bank, with clients in the food and agriculture sector. The topic of animal welfare is therefore relevant for Rabobank and should be viewed in its challenging global context.

Rabobank recognizes that global meat and dairy consumption are increasing and that the current food system impacts the planet. Rabobank's clients are challenged to change their agricultural practices and to make investments, while boosting their sustainable food productivity. At the same time there are increasing concerns regarding animal welfare among consumers, society and the worldwide food and agriculture sector.

Rabobank recognizes the need to address these concerns, yet can only do so within the limits of the role that a bank has in relation to individual clients and sectors in the real economy. In doing so, Rabobank is conscious of the complexity of regional, cultural and regulatory diversity in which clients operate.

Rabobank believes that positive engagement with external stakeholders, including clients, to enhance animal welfare is more fitting to its role as a bank, rather than categorical de-risking and exclusion.

Rabobank explains that it is committed to supporting clients to futureproof their businesses and contribute to a more sustainable food system, including potential improvements on animal welfare. Rabobank's role is not comparable to clients' direct operational control. The extent of engagement and the leverage on clients is often dependent upon the market contexts in which clients operate and a legal landscape that is fragmented.

In this context, Rabobank has developed a global animal welfare standard that sets minimum requirements for clients to meet. Rabobank continuously reviews this standard, using feedback from dialogues with clients and other stakeholders. Rabobank performs assessments on animal welfare on the basis of this standard and seeks to improve its processes using the Guidelines, which include animal welfare since 2023. Next to the minimum standards, Rabobank's management systems also include supplementary client engagement strategies where this is feasible and appropriate. Rabobank uses its industry knowledge, global networks and financial solutions to try to help clients increase positive impact and reduce negative impact.

In Rabobank's view, WAP does not adequately account for the role a bank can or should play in operational inspections or field-level enforcement. The provision by Rabobank of financing and financial services, as well as Rabobank's exercise of due diligence, does not transfer responsibility for any adverse impacts from the client to Rabobank. While acknowledging WAP's expertise, and maintaining an open attitude to dialogue, Rabobank has a different view on a bank's role and possible impact.

Rabobank is open to resume the dialogue with WAP, mediated by the NCP, if the case is considered admissible, exchanging knowledge on animal welfare in a constructive manner and appreciating each other's role in the process. The willingness to further examine this case does not imply that Rabobank acknowledges to have violated the Guidelines.

Proceedings at the NCP to date

Since the submission was received on 2 October 2025, the following steps have been taken:

- On 9 October 2025, the NCP sent a confirmation of receipt to the notifying party and informed the enterprise of the notification. Both parties also received a description of the NCP procedure.
- On 11 November 2025, the NCP held a first meeting with the notifying party.
- On 12 November 2025, the NCP held a first meeting with the enterprise.

- On 15 December 2025, the NCP received the initial written response to the notification from Rabobank.
- On 27 February 2026, the NCP sent the draft Initial Assessment to both parties, giving them two weeks to respond.
- On 23 April 2026, the NCP published the Initial Assessment.

Initial assessment by the NCP

The NCP has decided to accept the submission. This decision has been taken following an assessment by the NCP as to whether the issues raised warrant further examination. In its assessment, the NCP took into account the following six criteria set out in the commentary to the Procedural Guidance, paragraph 33:

The identity of the party concerned and its interest in the matter

The notifying party is World Animal Protection Netherlands (WAP), a non-governmental organisation active in the field of animal welfare. It has a clear and long-standing interest in the matters raised in this complaint. WAP has engaged with Rabobank since 2016 on issues related to animal welfare.

It is standing practice that NCPs will accept submissions filed by trade unions, NGOs or other organisations that seek to address causes they defend. As the notifying party is an organisation defending causes that relate to the issues raised, the NCP is of the opinion that the notifying party has a legitimate interest in the issues raised in this submission.

Whether the issues raised are material and substantiated

In line with the Commentary to the Procedural Guidance for NCPs, paragraph 33, the NCP interprets ‘material and substantiated’ to mean that, based on the information submitted, the issues raised are relevant to the implementation of the Guidelines and supported by sufficient and credible information.

The submission is material in the sense that it refers to the alleged non-observance of provisions of Chapter II (General Policies) and Chapter VI (Environment).

The issues raised by the notifying party are sufficiently substantiated by background information, amongst others by scientific studies, analysis of Rabobank’s annual reports and policies, a survey carried out by WAP, and expert opinions.

Whether the enterprise is covered by the Guidelines

Rabobank is a multinational enterprise within the meaning of the Guidelines. Rabobank is a financial institution that operates worldwide. It is headquartered in the Netherlands.

Whether there seems to be a link between the enterprise’s activities and the issues raised in the specific instance

The submission concerns Rabobank’s financing activities in the meat and dairy sector at large and its due diligence and transparency policies in relation to animal welfare as a financial institution. The notifying party points to 52 companies in the supply chain of industrial meat and dairy production, which would include companies that are allegedly causing and contributing to adverse impacts on animal welfare. According to the notifiers, Rabobank provided loans and underwriting services to these companies between 2016 and 2024. These activities fall within the scope of the Guidelines.

Therefore, the NCP considers that there seems to be a link between the company’s activities and the issues raised in the submission. The NCP emphasises that this does not imply any finding as to whether Rabobank has acted in accordance with the OECD Guidelines.

The extent to which applicable law and/or parallel proceedings limit the NCP’s ability to contribute to the resolution of the issue and/or the implementation of the Guidelines

The NCP is not aware of any ongoing judicial proceedings concerning the issues raised in the submission that would preclude its consideration of the case.

Concerning applicable law, it is relevant to note that the Guidelines, including their reference to the Terrestrial Code, go beyond Dutch and European law. Chapter 1, paragraph 2 of the Guidelines states that: *“in countries where domestic laws and regulations conflict with the principles and standards of the Guidelines, enterprises should seek ways to honour such principles and standards to the fullest extent which does not place them in violation of domestic law.”* This specific instance concerns alleged violations of principles and standards of the Guidelines. Overall, the NCP does not identify, at this stage, legal or procedural barriers that would prevent its consideration of this specific instance or the implementation of the Guidelines.

Whether the examination of the issue would contribute to the purposes and effectiveness of the Guidelines

The Dutch NCP believes that in accepting this notification it can contribute to the Guidelines’ purposes and effectiveness.

The purpose of the Guidelines is to promote positive contributions by multinational enterprises to economic, environmental and social progress worldwide by setting out expectations on responsible business conduct. In this context, the NCP considers that this specific instance may help to clarify the responsibilities under the Guidelines, including in relation to animal welfare, for enterprises in the financial sector.

With respect to effectiveness, the NCP considers that, through its facilitation, it may contribute to a resolution of the issues relating to the implementation of the Guidelines between the parties by offering its good offices, providing clarifications on the application of the Guidelines in this particular case and/or developing meaningful recommendations on responsible business conduct.

Conclusion

The NCP is of the opinion that this submission **warrants further examination** on the basis of the criteria laid down in the commentary to the Procedural Guidance, paragraph 33. The conclusion reached by the NCP in this initial assessment is based on the information received from both parties. In making this assessment, the NCP does not express an opinion on the correctness of the statements of the parties or the validity of the documentation provided by them, nor on their possible impact on the alleged issues raised in the specific instance.

Next steps

In accordance with the Specific Instance Procedure of the Dutch NCP, the NCP **accepts** this case for further examination and offers its good offices to the parties. The NCP has asked both parties whether they are willing to engage in a mediation/conciliation process, with the aim of the NCP facilitating a dialogue between the parties, with a view to seeking an agreed solution that is compatible with the Guidelines.

Both the notifying party and the enterprise have accepted the NCP's good offices. In accordance with the NCP procedure, further activities relating to the specific instance procedure will be confidential while good offices are ongoing. The NCP will, together with the parties, take the necessary steps to guarantee a careful and confidential process.

If the parties cannot reach an agreement as a result of the good offices, the NCP will, in principle, examine the issues and provide recommendations concerning the observance of the Guidelines. In any case, it will complete the procedure by issuing a Final Statement, which it will publish on its website.

The role of National Contact Points (NCPs) is to further the effectiveness of the OECD Guidelines. The Dutch government has chosen to establish an independent NCP, which is responsible for its own procedures and decisions, in accordance with the Procedural Guidance section of the Guidelines. In line with this, the Dutch NCP consists of four independent members, supported by four advisory government officials from the most relevant ministries. The NCP Secretariat is hosted by the Ministry of Foreign Affairs. The Minister for Foreign Trade and Development Cooperation is politically responsible for the functioning of the Dutch NCP. More information on the OECD Guidelines and the NCP can be found on the [NCP Website](#).

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