



OECD GUIDELINES
FOR MULTINATIONAL
ENTERPRISES

NATIONAL CONTACT POINT
FOR RESPONSIBLE BUSINESS
CONDUCT THE NETHERLANDS

Migrant Justice vs. Ahold Delhaize

Date: 22 May 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 cases and NCPs are not judicial bodies, NCPs cannot impose sanctions, directly provide compensation nor compel parties to participate in a conciliation or mediation process.

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Executive summary

On 7 April 2025, the Dutch National Contact Point (NCP) for Responsible Business Conduct received a notification of a specific instance from Migrant Justice (hereinafter the notifying party or submitter) regarding an alleged violation of the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (hereinafter the Guidelines) by Koninklijke Ahold Delhaize N.V. (hereinafter Ahold Delhaize).

Migrant Justice is a farmworker-led human rights organisation based in Vermont, United States. Ahold Delhaize is a Netherlands-based multinational food retail company and the parent company of the U.S. supermarket brand Hannaford.

The complaint relates to alleged human rights abuses in the dairy supply chain of Hannaford in the northeastern United States, in particular on farms in Vermont, Maine and New York that supply milk for Hannaford’s private-label products via cooperatives and processors. The notifying party states that migrant dairy workers on these farms face inadequate and unsafe housing, excessive working hours, conditions amounting to forced labour, unsafe working environments, discrimination, and retaliation when raising concerns. It argues that Ahold Delhaize is directly linked to, and contributes to, these adverse impacts through its ownership of Hannaford, its purchasing practices, and its failure over several years to address well-documented abuses. The complaint further alleges that Ahold Delhaize has not conducted adequate human rights due diligence, has not ensured effective access to remedy (including through its “Speak Up Line”), and has not provided sufficient transparency about its dairy supply chain and audit outcomes. The notifying party claims that these issues relate to Chapter II (General Policies), Chapter III (Disclosure), Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations) of the Guidelines.

Ahold Delhaize responds that the complaint should not warrant further examination by the Dutch NCP, or alternatively should be transferred to the U.S. NCP. The company argues that the submission forms part of an ongoing campaign to pressure Hannaford to join the Milk with Dignity programme and that Migrant Justice has not provided sufficient and credible evidence of current human rights abuses, noting that the most recent allegation cited dates back more than two years. Ahold Delhaize points to its Standards of Engagement, its human rights due diligence efforts, and a human rights impact assessment on the US dairy supply chain (initiated before the complaint and including Migrant Justice as a stakeholder) as evidence that it is actively addressing risks to migrant workers. It also notes that Hannaford has investigated issues raised and engaged with Migrant Justice at senior level. On which NCP should be in the lead, Ahold Delhaize emphasises that all alleged impacts and the relevant supply chain are located in the United States and submits that, if the case is to be examined under the Guidelines, the U.S. NCP is the more appropriate forum.

Coordination

The Dutch NCP coordinated this notification with the NCP of the United States. Following consultations with the OECD Secretariat, both NCPs agreed that the Dutch NCP would take the lead in handling this specific instance. The U.S. NCP has an advisory and supporting role.

Brief overview of the timeline

On 28 May 2025 the NCP held a first online meeting with the notifying party. On 17 June 2025 the NCP held a first online meeting with Ahold.

On 1 July 2025, the NCP received the initial written response from Ahold. The NCP shared the draft initial assessment with the parties on 29 April 2026 for comments within two weeks. The Initial Assessment was published on the NCP website on 22 May 2026.

The NCP regrets that the indicative timelines for the Initial Assessment were not met in this case. The substantial delay was due to a combination of factors, including high case load and the duration of the coordination phase.

Conclusion

The Dutch NCP concludes that the notification concerning Ahold Delhaize **warrants further examination** based on the following criteria set out in the commentary to the Procedural Guidance, paragraph 33:

- the identity of the concerned party and its interest in the matter;
- whether the issue is material, i.e. relevant to the implementation of the Guidelines; and substantiated, i.e. supported by sufficient and credible information;
- whether the enterprise is covered by the Guidelines;
- whether there seems to be a link between 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 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 consideration on their merits and does not imply any finding as to whether the enterprise has acted in accordance with the Guidelines.

Substance of the submission and the enterprise's response

Summary of the submission

The submitter has filed a complaint with the Dutch NCP regarding Ahold Delhaize's responsibility for alleged human rights violations in the dairy supply chain of its U.S. subsidiary Hannaford. The complaint concerns dairy farms in the U.S. Northeast that supply milk for Hannaford's private-label products through cooperatives and processors such as DFA, Agri-Mark and H.P. Hood. According to the submitter, migrant dairy workers on these farms face inadequate and unsafe housing, excessive working hours, indicators of forced labour, unsafe working environments, discrimination, and retaliation when raising concerns. The submitter argues that Ahold Delhaize is both directly linked to, and contributing to, these adverse impacts through its ownership of Hannaford, its purchasing practices, and its failure over several years to address well-documented abuses.

The complaint alleges that Ahold Delhaize has failed to carry out adequate human rights due diligence and to provide effective access to remedy in line with the OECD Guidelines. In particular, the company's reliance on internal standards (Standards of Engagement), the FARM assessment scheme, and the "Speak Up Line" grievance mechanism is claimed to be insufficient: audits are described as not focused on human rights and lacking enforcement, while complaints filed by workers via online platform EthicsPoint allegedly led to delayed, opaque or dismissive responses without meaningful investigation or remediation and, in some cases, to retaliation at farm level. The submitter further contends that Ahold Delhaize does not adequately disclose information on its dairy supply chain, audit outcomes or risk-mitigation measures, limiting transparency for workers and stakeholders.

According to the submitter, these issues may amount to breaches of the OECD Guidelines, in particular with respect to General Policies, Disclosure, Human Rights, and Employment and Industrial Relations. The complaint also argues that Ahold Delhaize's refusal to join the worker-driven "Milk with Dignity" programme represents a missed opportunity to align its practices with OECD expectations.

The complaint highlights systemic risks to migrant workers' rights in a high-risk agricultural sector and questions Ahold Delhaize's oversight of Hannaford and its dairy suppliers. The submitter requests that the Dutch NCP accept the case, assess Ahold Delhaize's alignment with the OECD Guidelines, and use its good offices to facilitate dialogue. The broader stated aim, as formulated by the submitters, is for Ahold Delhaize to adopt effective, worker-centred due diligence and grievance mechanisms (potentially through participation in the Milk with Dignity programme) to remedy existing harms, improve labour and housing conditions in its U.S. dairy supply chain, and prevent similar abuses in the future.

Enterprise's response

Ahold Delhaize responds that the complaint filed by Migrant Justice should be found inadmissible by the Dutch NCP, or alternatively be handled by the U.S. NCP. The company argues that the submission is part of a long-running campaign to pressure its U.S. brand Hannaford to join the Milk with Dignity programme, and that the complaint does not provide sufficient and credible evidence of ongoing human rights abuses in its U.S. dairy supply chain. Ahold Delhaize notes that the most recent incident cited dates back more than two years and that the complaint does not demonstrate that alleged abuses are currently occurring.

The company further points to the steps it has taken over the past six years to identify and address human rights risks for migrant workers in Hannaford's dairy supply chain. It refers its human rights due diligence processes, and a human rights impact assessment on the U.S. dairy supply chain that predates the complaint and in which Migrant Justice is participating as a stakeholder. Ahold Delhaize also notes that Hannaford has investigated issues raised by Migrant Justice, that senior sustainability staff proactively offered and held a meeting with the organisation, and that various actions have been taken in response to identified risks. In the company's view, this demonstrates that it is conducting appropriate due diligence and engaging with stakeholders, even if Migrant Justice disagrees with the outcomes, in particular Hannaford's decision not to join Milk with Dignity.

On which NCP should be in the lead, Ahold Delhaize accepts that it is headquartered in the Netherlands but argues that this does not make the Dutch NCP the appropriate forum. It stresses that all alleged impacts, the entire relevant supply chain, and the applicable legal and regulatory context are located in the United States, and that all investigative and follow-up work to date has been carried out by U.S.-based personnel. The company therefore considers that, if the case is to be examined under the OECD Guidelines, the U.S. NCP is better placed to handle it, given its access to U.S. federal and state-level expertise on agricultural labour standards.

Ahold Delhaize concludes that the complaint should either be rejected as inadmissible for lack of sufficient, up-to-date and credible information, or, if the NCP decides to proceed substantively, transferred to the U.S. NCP as the more appropriate forum for further consideration.

Proceedings of the NCP to date

Since the receipt of the submission on 7 April 2025, the following steps were taken:

- On 18 April 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 16 May 2025, the NCP held a coordination call with the U.S. NCP.
- On 28 May 2025, the NCP held its first meeting with the notifying party.
- On 17 June 2025, the NCP held its first meeting with the company.
- On 1 July 2025, the NCP received the initial written response to the notification from Ahold Delhaize.
- On 9 July 2025, the NCP held a second coordination call with the U.S. NCP.
- On 17 July 2025, the NCP held a third coordination call with the U.S. NCP.
- On 8 September 2025, the Dutch and U.S. NCP's consulted the OECD Secretariat regarding coordination.
- On 29 April 2026, the NCP sent the draft initial assessment to both parties for comments within 2 weeks.
- On 22 May 2026, the NCP published the initial assessment.

Coordination

The notification was submitted to the Dutch NCP and concerns, among other things, Ahold Delhaize's policies and due diligence at headquarters level. Ahold Delhaize is headquartered in the Netherlands, while the alleged human rights impacts raised in the notification occurred in the United States. The Dutch NCP therefore engaged in coordination with the United States National Contact Point, in line with the OECD Guidelines and the Procedures for NCPs.

In the course of this coordination, the U.S. NCP suggested that it was also well-placed to serve as lead NCP, given that the alleged issues and impacts occurred in the United States. Following consultations with the OECD Secretariat, both NCPs agreed that the Dutch NCP would take the lead in handling this specific instance in light of the fact that, while both NCPs believed they were capable of serving as lead NCP, the Guidelines note that, "if the NCPs fail to reach consensus, the NCP(s) that received the specific instance(s) should make a final decision on the case in consultation with the other NCPs concerned and keep them informed regularly of the progress of the case." The US NCP has an advisory and supporting role.

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 specific instance is submitted by Migrant Justice, a farmworker-led human rights organisation based in Vermont, United States. It is standing practice that NCPs accept submissions filed by trade unions, NGOs or other organisations that seek to address causes they defend. Hence, 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-compliance by Ahold Delhaize of provisions in Chapter II (General Policies), Chapter III (Disclosure), Chapter IV (Human Rights) and Chapter V (Employment and Industrial Relations) of the Guidelines. The issues raised by the notifying party are sufficiently substantiated by extensive background information and research.

It should be noted that in this stage of the procedure the NCP assesses the information provided on a prima facie basis and does not make an assessment of the issues raised on their merits, as further examination is envisioned in the next stage of the process. Therefore, a decision to accept a submission for further examination does not imply that the Guidelines were not observed by the enterprise.

Whether the enterprise is covered by the Guidelines

Ahold Delhaize is a multinational company headquartered in the Netherlands, following a merge between Ahold (NL) and Delhaize (BE) in 2016. The corporation operates a large network of supermarkets and grocery stores, primarily across the U.S., Europe and Indonesia. The company's subsidiaries include a number of brands, amongst them the American supermarket chain Hannaford.

According to Chapter 1, para. 4 of the Guidelines, "[a] precise definition of multinational enterprises is not required for the purposes of the Guidelines. While the Guidelines allow for a broad approach in identifying which entities may be considered multinational enterprises for the purposes of the Guidelines, the international nature of an enterprise's structure or activities and its commercial form, purpose, or activities are main factors to consider in this regard."

The international nature of Ahold Delhaize's structure paired with its commercial purpose and activities lead to the conclusion that Ahold Delhaize is a multinational enterprise in the sense of the Guidelines.

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

The issues raised in the complaint can reasonably be understood as linked to Ahold Delhaize's activities, as the alleged impacts occurred within the supply chain of one of its subsidiaries, Hannaford. This American supermarket chain sources dairy products directly from the farms where, according to the notifying party, human rights violations take place. Consequently, there appears to be a link between Ahold Delhaize's activities and the issues raised in the specific instance.

The NCP's assessment that there seems to be a link between the enterprise's activities and the issues raised in the specific instance does not imply any finding as to whether, or how, that connection falls within the categories of involvement set out in the 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 proceedings that address the issues raised in this specific instance that concern Ahold Delhaize.

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

The NCP is of the view that by accepting this notification it can contribute to the purposes and effectiveness of the Guidelines.

The Guidelines aim to promote positive contributions by multinational enterprises to economic, environmental and social progress worldwide by setting out expectations on responsible business conduct. Examination of the issues raised in this notification has the potential to contribute to the purpose of the Guidelines by clarifying the expectations under the Guidelines for a large food retail company like Ahold Delhaize in relation to human rights risks in agricultural supply chains, including the use of leverage over subsidiaries and suppliers. It could also provide insights into the application of the Guidelines to complex, multi-tier value chains and into the circumstances under which a company's relationship to adverse impacts may evolve from being directly linked to contributing through its own actions or omissions.

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

Conclusion

The NCP is of the opinion that this submission **warrants further examination** on the basis of the criteria set out in the commentary to the Procedural Guidance, paragraph 33. The conclusion reached by the NCP in this initial assessment is based on a prima facie assessment of the information received from both parties.

Next steps

In accordance with the Dutch NCP Specific Instance Procedure, 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 do not reach an agreement as a result of the good, 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 [website](#).

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