

## SUMMARY REPORT: Peer Exchange on the Effective Development and Implementation of National Action Plans on Business and Human Rights in Africa

The Peer Exchange on the **Effective Development and Implementation of National Action Plans on Business and Human Rights in Africa** was co-convened by the Danish Institute for Human Rights (DIHR) and the Network of African National Human Rights Institutions (NANHRI), and took place in Lusaka, Zambia, on 06 October 2025.

The exchange brought together representatives of government ministries and national human rights institutions (NHRIs) from Kenya, Uganda, Ghana, Namibia, Zimbabwe, Ethiopia, Zambia, Tanzania, Liberia, and Malawi. The views expressed during the peer exchange are those of the participants and do not necessarily reflect the positions of the co-organising institutions.

The co-organisers extend their sincere appreciation to all participants for sharing their insights and expertise.

The Peer Dialogue was organised by NANHRI and the DIHR to foster regional learning and technical exchange on National Action Plans on Business and Human Rights (NAPs). It sought to support African States in aligning their NAPs with the UN Guiding Principles on Business and Human Rights, while strengthening gender responsiveness and promoting inclusive development. The Dialogue was structured around three thematic sessions, each guided by targeted questions. These questions were informed by a DIHR [practice note](#) examining how gender considerations are integrated into NAPs, as well as the UN Working Group on Business and Human Rights' [gender lens](#) to the UN Guiding Principles. Participants shared country-specific experiences and responded to facilitator prompts. This report draws directly on those contributions, synthesising key insights and, where relevant, quoting participants to reflect the depth and richness of the exchange.

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## Introductory Remarks

The introductory remarks by Gilbert Sebihogo, Director of NANHRI, highlighted the urgency of strengthening both the implementation and gender-responsiveness of National Action Plans on Business and Human Rights (NAPs) across Africa. He noted that although recognition of NAPs has grown since the adoption of the UN Guiding Principles in 2011, only a limited number of African states have developed or initiated such plans. He emphasised the continued need for NAPs that are context-specific, inclusive, and responsive to gendered impacts.

Mr. Sebihogo observed that gender considerations remain insufficiently embedded within business and human rights frameworks. Women and girls, he stressed, experience business-related human rights harms in distinct and often disproportionate ways and face additional barriers in seeking remedy. Despite references to gender in the UNGPs, the broader business and human rights discourse still falls short in addressing these differentiated impacts. He warned that inadequate analysis of gender relations and power dynamics during NAP processes can lead to the omission of critical issues such as systemic discrimination, gender-based violence, and the gendered division of labour.

He underscored the importance of peer learning and knowledge-sharing, noting that the Dialogue offers a valuable opportunity to exchange experiences, identify good practices, and advance gender-responsive approaches to NAP development. He highlighted the UN Working Group's [gender guidance](#) as an important resource for strengthening both NAP content and the participation of women and women's organisations. Mr. Sebihogo concluded by encouraging delegates to draw on collective African experiences to advance responsible and inclusive business conduct.

## **Keynote Address: The evolution and importance of NAPs as a vehicle for implementing the UN Guiding Principles on Business and Human Rights (UNGPs)**

The keynote address was delivered by Ms. Alice Munnely, Senior Adviser on Human Rights, Business and Tech with the Danish Institute for Human Rights, who traced the evolution of National Action Plans on Business and Human Rights and underscored their growing importance as strategic instruments for implementing the UNGPs. She noted that although global uptake of NAPs has steadily increased, business respect for human rights remains inconsistent, reinforcing the need to see NAPs not simply as policy documents but as frameworks that capture national priorities, legal duties, and the experiences of those most affected by business activity.

Ms. Munnely explained that since the first NAP was launched in 2013, the rationale for developing NAPs has expanded from a normative, obligation-driven exercise to a tool for policy coherence, risk management, and regulatory reform. In a context where mandatory human rights and environmental due diligence laws are accelerating globally, NAPs play an essential role in ensuring an effective “smart mix” of voluntary and mandatory measures.

She emphasised that Africa’s motivations for developing NAPs are distinct. Across the continent, NAPs provide opportunities to strengthen institutional capacity, address informality, and ensure that economic development - including through the African Continental Free Trade Area (AfCFTA) - is inclusive and rights-based.

To frame the Dialogue, Ms. Munnely outlined four rationales for developing NAPs:

- (1) Fulfilling legal obligations, by translating human rights commitments into coordinated national action and strengthening coherence across government;
- (2) Managing risk, including identifying and preventing harms in high-risk sectors and informal economies;
- (3) Leading by example, given the state’s role as both regulator and economic actor; and
- (4) Creating a level playing field, reducing uncertainty and supporting responsible business conduct across supply chains, particularly in the AfCFTA context.

She acknowledged that NAP development and implementation are often challenged by gaps such as insufficient baseline assessments, limited gender analysis, weak participation, or overreliance on voluntary measures. However, she highlighted that important lessons exist, many captured in DIHR’s updated [NAP Toolkit](#), while emphasising that peer exchange - such as this Dialogue - remains essential to contextualising best practice. Ms. Munnely concluded by reiterating that NAPs are dynamic, iterative processes requiring continuous learning.

## Session One: Beginning a NAP Process

Session One examined how countries initiate National Action Plan (NAP) processes, focusing on political commitment, governance frameworks, stakeholder engagement, and baseline assessments.

### Securing Political Commitment and Establishing Effective Governance

Countries at early stages of NAP development emphasised that political buy-in is often the single most critical - and most difficult - condition to secure. Zimbabwe's experience illustrated this vividly. Although the national commission had long documented widespread and systemic business related human rights violations, especially in the mining sector, it took nearly three years to obtain concrete government commitment. Early engagement attempts failed, largely due to confusion within government about national economic policy and a dominant narrative that framed human rights as a barrier to investment. Zimbabwe's "open for business" agenda, underpinned by a USD 12 billion mining target, had led to relaxed safeguards and reinforced skepticism toward the NAP process. In related human rights violations, especially in the mining sector, it took nearly three years to obtain concrete government commitment. Early engagement attempts failed, largely due to confusion within government about national economic policy and a dominant narrative that framed human rights as a barrier to investment.

Zimbabwe eventually overcame these barriers by building a robust evidence base - increasing investigations, publishing reports, and reframing human rights and economic development as mutually reinforcing. Strategic support from UNDP also helped bring government actors to the table. By August 2025, sustained engagement had yielded a clear government commitment.

Ethiopia's experience contrasted in pace but not in complexity. Political engagement emerged more quickly - within a year - because the national human rights commission had already undertaken BHR-related activities. Early capacity-building for ministries, civil society, and business actors created an informal multi-stakeholder platform that later formed the foundation of the NAP technical committee. Nonetheless, the Commission encountered skepticism from ministries concerned that BHR obligations might impede economic growth, and from businesses who feared being "named and shamed." Direct outreach to state ministers was essential to clarify the distinction between BHR responsibilities, international treaty obligations, and Ethiopia's UPR commitments. The EU Corporate Sustainability Due Diligence Directive also provided a powerful external motivator, reframing BHR as an economic necessity rather than a regulatory burden.

The discussion underscored that in early stages, the governance structure must be credible, inclusive, and clearly anchored in government. Uganda and Ghana highlighted the importance of identifying the appropriate lead ministry and ensuring coordination across ministries from the outset. Ghana's experience demonstrated that even where initial leadership structures disappear - as when the Ministry of

Business was abolished - processes can recover through strategic re-anchoring, in this case under the Ministry of Justice.

Across contexts, participants agreed that speed should not come at the expense of legitimacy. Ghana's deliberate extension of its process from six months to three years allowed for meaningful engagement across all 16 regions and enabled specialised consultations with women and sector-specific groups such as women in mining. Both Ghana and Kenya emphasised that anchoring BHR in the national development agenda - not solely in human rights language - is often essential for obtaining political attention, especially where senior political leaders have business backgrounds.

### **Integrating Gender: Structures, Strategies, and Cultural Realities**

The session revealed diverse approaches to aligning NAP processes with national gender priorities, as well as the deep structural and cultural challenges that shape participation.

Uganda's process benefitted from being led by the Ministry of Gender, Labour and Social Development, which brought strong gender expertise and existing partnerships with civil society. Gender budgeting requirements made civil society engagement not only desirable but compulsory, and long-standing MoUs ensured trust and collaboration. This institutional architecture meant that gender considerations were embedded from the outset.

Kenya emphasised the importance of regional consultations to reflect the country's diverse gender dynamics. While gender was not designated as a standalone thematic area, it was systematically mainstreamed across NAP sections. Kenya also highlighted the need for intentionality when mobilising women, stressing that institutional invitations alone rarely ensure balanced participation. Countries were encouraged to use women-only consultation spaces, women facilitators, and tailored methods for discussing sensitive issues such as sexual and gender-based violence.

Zambia's experience underscored how patriarchal social norms can severely limit women's participation. In certain provinces, cultural rules prevented women from speaking in front of men. Zambia responded by organising separate consultation sessions for women, often led by women facilitators or male facilitators trained to navigate gender norms. Tanzania emphasised the value of engaging specialised gender institutions, which often hold extensive research that can strengthen the evidence base for gender-responsive NAPs.

The session also explored child participation. Both Tanzania and Zambia shared models for consulting children - through UNICEF, through direct engagement with children in extractive areas, and through educational institutions selecting young representatives. These approaches resulted in children's rights being integrated as cross-cutting issues within their NAP processes. Despite the rich discussion on strengthening gender responsiveness, no country reported approaches that address

gender beyond the binary, indicating that considerations relating to gender-diverse persons have yet to be meaningfully incorporated into NAP processes.

### **Engaging Political Actors More Effectively: What Countries Would Do Differently**

Countries further along in their NAP journeys reflected on what they would change if they were beginning again. Kenya highlighted the need for more political champions, particularly in parliamentary committees, and for conducting a gender audit at the outset. Ghana emphasised that meaningful consultation requires time and should not be rushed. They found strong value in direct engagement with regional ministers, chiefs, and local administrative structures, which enhanced ownership and informed regional consultations.

Both Ghana and Kenya underscored the importance of involving central coordination bodies - such as the Head of Public Service - to compel cross-ministerial participation. They also stressed the importance of framing BHR in the language of trade, investment, and development to engage high-level political leaders.

### **Securing Commitment from External Stakeholders, Especially Business Actors**

Countries at the early stages of NAP development discussed strategies for building private sector engagement. Uganda highlighted that the timing of its NAP coincided with significant national projects, including oil and gas and rare earth mining. Businesses saw the NAP as a practical tool for structuring community engagement and navigating resettlement negotiations. The EU CSDDD further incentivised business participation by linking BHR compliance to market access.

Ghana's inclusion of two business associations on its NAP steering committee helped cascade knowledge to their members, leading to company-led requests for guidance on human rights due diligence and sexual harassment policies. Ethiopia overcame business reluctance by directly engaging employers' associations and chambers of commerce, clarifying misconceptions about the Ethiopian Human Rights Commission's mandate and reinforcing that failure to meet BHR standards could jeopardise international market opportunities.

Zimbabwe's experience highlighted obstacles when private actors come from diverse cultural or religious backgrounds, making collective dialogue challenging. Uganda reminded peers not to overlook labour unions, which - where well organised - can be highly effective partners.

## Session Two: Drafting a NAP

Session Two focused on how countries translate evidence into NAP priorities and actions, the methods used to reconcile differing perspectives (from NBAs, stakeholders, and government), how gender is safeguarded during prioritisation, and the early choices that set up budgeting and resource mobilisation for success. The discussion underscored that good process design - who is involved, when, and with what roles - often matters as much as the content of the plan.

### Using the NBA to Identify Priorities and Guide Consultation Sequencing

Participants converged on the value of a National Baseline Assessment (NBA) as a springboard for a credible NAP. Ghana emphasised that the NBA helped surface non-obvious, systemic issues - for instance, restrictions on unionisation in specific sectors - and that fieldwork with questionnaires, interview guides, and focus groups sharpened the evidence base. This in turn allowed the team to “zoom in” on the most critical sectors (e.g., mining and telecommunications) and the most salient human rights risks.

Ethiopia described a different sequencing choice: with a draft NBA in hand, the Ministry of Justice preferred to complete regional consultations first and use that input to finalise the NBA and its prioritisation. This approach aims to ensure that the final prioritisation reflects both desk-based analysis and the lived experience emerging from the regions.

Two cross-cutting lessons emerged. First, the NBA should be practical and field-grounded, not an “armchair” exercise. Second, it should be treated as a decision-support tool for the NAP - rich enough to guide prioritisation, yet lean enough to avoid slowing momentum.

### Reconciling Evidence, Stakeholder Demands, and Government Commitments

Tensions between what the NBA identifies, what stakeholders prioritise, and what government is prepared to commit to are common - and navigable. Ghana noted that its NBA was less consultative than the subsequent NAP process by design: the baseline served primarily to map gaps in law, policy, and enforcement and establish a starting point. Differences between the perspectives of institutions and communities on certain topics were informative, signalling issues that required deeper dialogue as the NAP took shape.

Zambia’s journey illustrated the institutional dynamics that can complicate the hand-off from NBA to NAP (e.g., leadership changes), but also the value of external anchors. A UPR recommendation accepted in 2021 provided renewed impetus; capacity-building on the UNGPs helped stakeholders align around the baseline findings. Over time, coordination shifted to a structure where the Ministry of Justice chairs a technical working group and the Human Rights Commission serves as secretariat. In retrospect, the NBA functioned as a stepping stone - hard to progress

without, and instrumental in helping decision-makers “see” the situation on the ground.

Uganda cautioned against letting assessments absorb momentum. In their experience, government machinery can stall when faced with serial technical studies; they therefore prioritised assembling a technically strong drafting team, used the broader Human Rights Action Plan (where BHR issues were already reflected) to build familiarity, and moved forward with a standalone BHR NAP that proved politically more tractable.

A broad methodological challenge was raised: in an increasingly complex BHR landscape (technology, climate, minority rights, gender), no single researcher can credibly cover everything. Countries responded with practical solutions:

- Ghana partnered with academia, used a research group model, ran a national validation exercise, and committed to ongoing review (including a mid-term review).
- Kenya convened a national dialogue to agree the key themes, then engaged subject-matter experts per theme.
- Tanzania formed thematic working groups for the NBA and carried these through into drafting.
- Where resources constrain a full NBA, a suggestion was made to conduct rigorous stakeholder mapping, collect and verify evidence (including site visits), and focus on systemic patterns, not single cases - leveraging NHRI complaint data where relevant.

### **Safeguarding Gender Considerations During Prioritisation**

Countries described complementary pathways to ensure gender considerations do not fall away during prioritisation:

- Kenya drew on NHRI functions - complaints handling, inquiries, investigations - to identify systemic gendered harms and to verify them with stakeholders. During implementation, the Human Rights Commission conducted gender audits of company policies and issued practical advice on mainstreaming gender; within the technical committee, women’s and girls’ rights groups play an active role.
- Ethiopia embedded gender inclusivity and sensitivity in its NAP consultation framework from the outset, pairing this with vulnerability mapping to prioritise work with relevant groups.
- Ghana anchored its approach in regional and international frameworks (e.g., CEDAW, the Maputo Protocol), adopted a broad definition of gender that

explicitly includes vulnerable groups, and ensured gender balance in governance (noting that both steering committee co-chairs were women).

### **Budgeting and Resource Mobilisation: Designing for Delivery**

Participants stressed that how budgeting is approached during drafting can determine whether a NAP is implementable.

- Uganda underscored the value of a costed implementation action plan. Their NAP - costed at approximately USD 10 million - included a funding-gap analysis to distinguish between “baseline” resources and new needs. This clarity enabled the EU (via Enabel) to fund a national secretariat for NAP implementation, while other partners supported CSOs directly (e.g., Danish Embassy). Uganda uses an annual BHR symposium for stock-taking (“who is doing what, where”) and to open fund-raising pathways for civil society - promoting co-ownership across local government, private sector, and community actors. A mid-term evaluation is planned to course-correct on roles, resources, and messaging (including translation of the NAP into seven local languages and capacity-building for radio to standardise public communication).
- Kenya treats the NAP itself as a fund-raising tool: define the issues, set out an implementation matrix for the full term, break it into annual workplans, cost it, and then match partners to specific elements (e.g., OHCHR support on HRDD framework development). Looking back, Kenya would sharpen activity-level specificity and indicators from the start and align the NAP to the government’s five-year strategic planning cycle to secure budget lines for implementing ministries. The Attorney General’s office highlighted the importance of state commitment to resource the plan.
- Ghana echoed the need for tight alignment with national policies. Assigning clear institutional roles created de facto incentives for ministries to seek funds and report annually on progress.

## Session Three: Implementation and Evaluation of a NAP

Session Three examined how countries transition from NAP drafting to implementation, the institutional arrangements needed to sustain momentum, and the monitoring and evaluation (M&E) approaches used to assess progress. Participants reflected candidly on challenges in data collection, coordination, accountability, and long-term sustainability - highlighting that implementation often reveals gaps in planning that can be addressed in subsequent NAP cycles.

### **Building NAP Monitoring Frameworks That Drive Accountability**

Countries in the implementation stage stressed that a NAP is only as effective as the monitoring architecture that accompanies it. Ghana underscored that its M&E system is still evolving and that key decisions - such as whether to develop a standalone M&E plan - have been delegated to the high-level implementation committee led by the Presidency. This governance arrangement distinguishes between political oversight (under the Presidency) and secretariat functions (under the Human Rights Commission). Ghana aims for a monitoring approach that provides a “bird’s-eye view” of business and human rights trends, incorporating signals on whether private sector actors are demonstrating respect for human rights principles.

Uganda emphasised the need for monitoring frameworks that capture cross-regional and cross-border issues, such as illicit trade, which cut across multiple jurisdictions. This, they noted, requires requesting data from corporate entities - including gender-disaggregated data - to complement state information systems.

DIHR experts drew an important distinction between monitoring whether actions have been implemented and evaluating whether those actions were the right ones to begin with - urging countries to consider both dimensions in their M&E design.

Kenya has adopted a logical framework approach, starting with the overarching objectives of the NAP and working backward to define outputs, activities, and indicators. However, experience has revealed challenges in attribution, particularly where multiple actors contribute to a single result area (e.g., access to remedy reforms involving labour inspectorates). Kenya stressed the importance of making the M&E framework fully consultative, so that all actors understand the commitments assigned to them. Fragmentation remains a challenge: many actors report on BHR activities without linking their work to the NAP, and the country still lacks a unified reporting tool. This creates difficulties in understanding overall progress across sectors.

Countries acknowledged that tracking gender-specific commitments requires strengthening national data systems. Kenya does not yet monitor gender dimensions of NAP implementation systematically but is working with the National Bureau of Statistics to develop gender-disaggregated data collection tools that can be integrated into national datasets. Uganda observed that gender-disaggregated data

challenges are not unique to the NAP; they must be addressed early during activity design so that partners are equipped to capture the required information.

Kenya also noted the importance of evaluating not only whether activities were performed, but whether they had impact - particularly in addressing the differentiated experiences of women and girls.

### **Institutional Coordination: Moving from Drafting to Delivery**

Countries highlighted that transitioning from drafting to implementation requires clear governance structures, political leadership, and predictable coordination mechanisms.

Ghana has established a high-level implementation committee, chaired by the President and vice-chaired by the Human Rights Commission - ensuring sustained political attention. A parallel coordination committee, which includes the national statistics and planning institutions, supports data management and technical oversight. Overlapping membership between the two bodies ensures information flows smoothly.

Kenya's implementation committee brings together state and non-state actors but faces challenges in meeting regularly and maintaining focus. Much meeting time has been spent on capacity-building, rather than forward planning, due to gaps in members' understanding of BHR and the NAP. Kenya noted that many ministries are implementing actions aligned to the NAP without realising it, suggesting the need for stronger integration of NAP actions into ministries' annual workplans and national strategic plans. Without clear reporting obligations, the Ministry of Justice cannot compel other ministries to provide data, underscoring the need for formal reporting mechanisms established at the outset.

Ethiopia stressed that the M&E plan should not be an afterthought; it should be conceived as a core part of the NAP design. Uganda noted that donor-funded projects tend to generate their own reporting cycles, which often do not map neatly onto NAP processes.

Participants explored practical challenges related to ensuring participation and accountability within committees, including attendance fatigue, inconsistent representation, and mismatched seniority levels. Countries shared strategies such as:

- specifying the seniority level expected for each institution;
- attaching Terms of Reference to invitations;
- having chairs (e.g., Permanent Secretaries) with sufficient authority to ensure attendance;

- maintaining attendance records and privately addressing repeated absences (Ghana), including requesting institutional replacements when needed.

Kenya acknowledged the difficulty of institutional representation - where different individuals may attend each meeting, leaving gaps in institutional memory. Ethiopia noted the temptation to encourage attendance by holding retreats outside the capital, though some development partners now discourage the practice.

Malawi and Uganda emphasised the importance of clear agendas and selecting participants who understand why the meeting matters. Zimbabwe shared that appointing the same individuals to attend all meetings strengthened capacity-building and continuity.

Across these exchanges, participants reflected on the underlying question: Is the NAP adding value, or simply duplicating existing work? Ensuring clarity of roles, learning loops, and high-level leadership is essential for creating “additionality” in implementation.

### **Sustaining Momentum and Learning Through Implementation**

A recurring theme was how to maintain momentum after the launch of the NAP, particularly in contexts where political priorities shift.

Uganda stressed the need for a coherent communications strategy, supported by translation of the NAP into multiple local languages and capacity-building for radio journalists to avoid misinterpretation. They highlighted the importance of shaping public narratives around “business and human rights” to drive a paradigm shift in understanding.

Kenya has conducted journalist training as well and noted that trained journalists now often play a watchdog role, even reporting concerns directly to the Human Rights Commission when they cannot publish stories. Kenya reported that business associations, chambers of commerce, and UN Global Compact networks have increasingly helped cascade BHR information through their memberships, strengthening private-sector engagement.

Ghana has embedded a communications chapter in its NAP and uses multimedia outreach - including video content and forthcoming animations developed with UNDP - to raise awareness among communities and businesses.

Zambia highlighted the valuable role of technical working group members from different sectors - such as environment, gender, or labour - who bring specialised knowledge that strengthens NAP implementation.

To foster the long-term sustainability of the NAP, participants emphasised the need for implementation processes that are:

- aligned with existing government strategies,
- supported by cross-institutional budget commitments, and
- anchored in ongoing data collection, monitoring, and learning.

Kenya reflected that greater alignment with existing government policies from the outset would have strengthened coherence and budgeting. Uganda noted the importance of expanding capacity at local government level, where implementation actually occurs.

## Conclusion

The Peer Dialogue underscored that developing and implementing effective, gender-responsive National Action Plans on Business and Human Rights (NAPs) is a dynamic, iterative, and context-dependent process. Across all sessions, participants highlighted common challenges but also a rich set of practical strategies that countries in Africa are using to advance the business and human rights agenda.

Five cross-cutting insights emerged.

- 1) First, **securing political buy-in requires both strategic framing and persistent advocacy**. Participants repeatedly emphasised that business and human rights messaging must be connected to national development priorities to resonate with political actors - particularly in contexts where economic growth, investment attraction, and informality shape policy choices. Sustained engagement, evidence-driven advocacy, and clear governance structures were essential in bringing political leaders, ministries, and other state actors into the NAP process.
- 2) Second, **gender responsiveness must be intentionally embedded throughout the NAP cycle**. Countries found that gender cannot be treated as a standalone theme or left to chance; it must be built into governance structures, consultation design, baseline assessments, and M&E frameworks. At the same time, the Dialogue revealed that gender-diverse perspectives remain largely absent from current approaches, with most countries focusing primarily on women and men rather than the full spectrum of gender identities.
- 3) Third, **stakeholder engagement benefits from regionalised consultations and trust-building**, particularly in contexts where cultural norms, geography, or historical tensions influence participation. Countries shared examples of women-only consultations, field verification visits, and partnerships with thematic institutions - all of which help build credibility and reach under-represented groups.
- 4) Fourth, **monitoring and evaluation frameworks require clarity, consultation, and integration with national systems**. Participants highlighted the importance of developing M&E approaches early in the NAP drafting process, ensuring that

indicators are realistic, disaggregated where relevant, and linked to ministry workplans and national statistics systems. Countries agreed that fragmented reporting remains a major challenge, and that consultative M&E design can prevent institutions from being tasked with responsibilities they did not anticipate.

- 5) Finally, **long-term sustainability depends on strategic alignment, resource planning, and coherent communications**. Aligning NAP actions with national development and budgetary cycles increases the likelihood of government financing. A consistent communications strategy - including translation of materials, capacity-building for media, and accessible public education tools - helps maintain momentum and public understanding over time.

Taken together, these insights reflect a continental movement toward more grounded, inclusive, and strategic NAPs. They also highlight areas where further innovation is needed.

## Recommendations

Based on the Dialogue, the following recommendations can guide states embarking on or strengthening their NAP processes:

### 1. Establishing Political Commitment and Foundations

- **Frame business and human rights as integral to national development** to secure high-level political support and connect with economic priorities.
- **Embed gender equality throughout governance structures and consultations from the outset**, ensuring gender expertise informs early decision-making.
- **Ensure early and meaningful involvement of technical ministry experts during drafting**, recognising that securing budgets later is difficult without early buy-in and co-design of NAP actions.

### 2. Evidence Generation and Consultation Design

- **Use National Baseline Assessments (NBAs) to identify systemic issues**, validate findings through fieldwork, and sequence consultations carefully to maintain momentum.
- **Recognise that NBAs are credibility anchors**, but when full NBAs are not feasible, apply rigorous stakeholder mapping, evidence verification, and NHRI data to generate a robust basis for prioritisation.

- **Navigate tensions openly** - between evidence, stakeholder expectations, and government commitments - using validation processes, capacity-building, and clear governance roles to reconcile differences.

### 3. Drafting and Prioritisation

- **Embed gender equality into data systems, analysis, and prioritisation frameworks**, ensuring gender considerations shape issue selection and action planning.
- **Acknowledge current gaps in gender inclusion**, especially regarding gender-diverse persons, and begin exploring how future NAP cycles can adopt more inclusive approaches.

### 4. Budgeting, Prioritisation, and Strategic Alignment

- **Align NAPs with national strategic plans and budgeting cycles** to ensure ministries can allocate resources and take ownership of implementation.
- **Use the NAP as a platform for resource mobilisation** by costing actions, identifying funding gaps, and engaging development partners and the private sector.

### 5. Implementation and Monitoring

- **Develop consultative M&E frameworks** with clear indicators, disaggregated data requirements, and realistic reporting mechanisms capable of measuring both implementation and impact.
- **Invest in coherent communication strategies** - from multilingual public materials to journalist training - to sustain awareness, transparency, and accountability during implementation.

## Acknowledgements

The Peer Exchange on the **Effective Development and Implementation of National Action Plans on Business and Human Rights in Africa** was organised by Furaha Charo of NANHRI and Alice Munnelly of the DIHR.

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