



**Oxfam submission to the
UN Working Group on Business
and Human Rights**

**Call for inputs: Extractive sector,
just transition and human rights**

June 2023

Preface

Oxfam is a global organization that fights inequality to end poverty and injustice in over 80 countries. Our core advocacy seeks to advance land rights, Indigenous rights, climate justice, and gender justice.

For over 20 years, Oxfam has partnered with communities impacted by oil, gas and mining projects and held powerful actors accountable for their human rights abuses and environmental harm. With the imperative of a phase out of fossil investments, we are supporting the governance of a sector in transition, balancing the ongoing need for transparency and accountability with the protection of human and environmental rights. As demand increases for minerals for renewable and energy storage technologies in the transition, we are increasingly advocating for a just transition to clean energy, highlighting the crucial role of Free, Prior, and Informed Consent (FPIC) in helping communities defend their lands and livelihoods, and elevating their demands for climate justice around the world.

Oxfam appreciates the opportunity to contribute input to the UN Working Group on Business and Human Rights (UNWG) in support of a just transition.

Summary of recommendations:

States must:

- **Phase out fossil fuel extraction, in a just and equitable way**, consistent with the principle of common but differentiated responsibilities.
- States must **make Human Rights and Environmental Due Diligence (HREDD) mandatory for all companies**, including state-owned enterprises, hold them **liable for human rights and environmental adverse impacts** and ensure **robust public law enforcement**.
- In the absence of legislation, States should still direct their implementing agencies and departments to **align with international norms** around responsible business conduct.
- Ensure effective **FPIC implementation**.
- Implement properly funded **protection mechanisms** to guarantee the rights of **human rights defenders (HRDs)** and provide for a **specific protection for women defenders**.
- Ensure **social protection coverage and meaningful investments in re-training** for workers previously employed in the fossil fuel sector.

Companies must:

- Commit to respecting human rights through the adoption of a **human rights policy** and development of a thorough **gender responsive HREDD approach**.
- Adopt clear and unambiguous **policy commitment to respect FPIC**.
- Ensure **meaningful rights holder engagement**.
- **Provide for or cooperate in the remediation of adverse impacts** with special attention to gender impacts.

- Ensure access to a **gender-sensitive grievance mechanism**, aligned with UNGP efficiency criteria.
- **Protect and uphold the rights of HRDs.**
- Undertake a **just and equitable phase out** in line with the Paris Agreed 1.5 C target, including a just transition plan (fossil fuel companies),
- **Adopt and implement science-based climate action plans**, including just transition plans (other extractive companies).
- Engage and **work with unions on remediation and re-training** for workers to ensure a fair transition.

STATE DUTY TO PROTECT HUMAN RIGHTS

Q1: How can States better advance human rights-compatible energy transition laws and policies that ensure responsible business conduct in all aspects of energy transition efforts and programs?

As the world transitions away from fossil fuel, those that bear the greatest responsibility for historic emissions – mainly those high-income countries responsible for the majority of greenhouse gas emissions, and extractive companies – have an obligation to phase out fossil fuel extraction first and fastest, consistent with the principle of common but differentiated responsibilities and in a just and equitable way.¹ When mining is needed, it must be conducted in a sustainable, just, and equitable way, holding companies accountable for their impact on communities.

As demand rapidly expands for minerals for renewable energy technologies, due diligence by States and companies is not keeping pace. Existing non-binding standards often don't align with international law and cannot be relied upon to satisfy corporate responsibilities under international norms on business and human rights.² Meanwhile, the lives and human rights of the people living near those investment projects are still impacted.³

¹ [Oxfam Natural Resource Justice Strategic Plan 2021–2025](#)

² While ICMM has raised the bar in terms of expectations on mining companies, they are still industry led, non-binding, do not necessarily align with international law, and therefore cannot be relied upon to satisfy corporate responsibilities under international norms on business and human rights. According to [Responsible Mining Foundation](#), the ICMM position statement on Indigenous Peoples', for instance, falls short of international standard of FPIC, as it only requires members to "work to obtain the consent of Indigenous Peoples..." In a recent assessment, RMF found evidence of compliance with the Mining Principles and position statements was weak and performances are highly variable across individual member companies. Source: Responsible Mining Foundation, "Assessment of ICMM member companies in RMI Report 2022 with respect to ICMM Performance Expectations," (Responsible Mining Foundation, Switzerland, 2022). Furthermore, an [EU study](#) found only 37% of companies were undertaking due diligence and only 16% doing so across their entire supply chains,

³ [OXFAM Submission UNWG UNGP 2021](#)

More than half of the world's mineral resources, including those that are key to transition technologies, like lithium and cobalt, are in or near Indigenous Peoples territories. One of the most important safeguards is the right to Free, Prior and Informed Consent (FPIC). For Indigenous peoples, the power to give or withhold consent is a right protected by international law, a crucial safeguard for the protection and realization of their collective autonomies and self-determination. Oxfam also recognizes FPIC as a best practice standard for local communities affected by extractive industry projects who do not fit the definitions of rights-holding Indigenous entities under international law.⁴

Women and gender-diverse people are disproportionately affected by extractive sector activities, due to their roles and responsibilities within their communities and families, but also due to existing gender-based discrimination.

To address those greater and distinct risks to women, Indigenous peoples, HRDs and other marginalized groups,⁵ States must comply with and **enforce existing human rights obligations** and ensure the **implementation of adequate FPIC processes**. But States need to **do more to strengthen and enforce protections for land, water, and other resources** that people depend on for their livelihoods.

States must adopt legislation that will make HREDD mandatory for all companies, including state-owned enterprises.

Legislation must be cross-sectoral, covering all companies irrespective of size, including the financial sector, with proportionate obligations taking into account, amongst others, the size and the risk exposure.

States must oblige companies to:

- **Respect human rights** and the environment in their own operations, in their global value chains and within their business relationships.
- **Identify, cease, prevent, mitigate, monitor and account for potential and actual human rights and environmental adverse impacts** through an ongoing and robust due diligence process, in accordance with existing standards, covering the entire value chain and not be limited to a companies' business relationships.
- Ensure meaningful gender-responsive **rights-holder engagement** on an ongoing basis.

⁴ This is especially the case across the African continent, where regional bodies like the African Commission on Human and Peoples' Rights, Pan African Parliament, and Economic Community of West African States have applied FPIC to non-Indigenous local communities and courts are finding the right to give or withhold consent exists in many customary law systems. In this way, FPIC represents a principle of best practice for sustainable development generally, a crucial project safeguard that can increase the legitimacy of a project in the eyes of all rights holders ([See joint OXFAM-CEPIL report Free, Prior, and Informed Consent in Africa - Oxfam Policy & Practice](#))

⁵ ['They offered me nothing for what they had destroyed': how the scramble for clean-energy minerals is hurting African communities - Views & Voices \(oxfam.org.uk\)](#)

- **Conduct intersectional human rights impact assessments (HRIA)**, aligning their assessments with the Guidance on Gender Dimensions of the UNGP Oxfam has also developed [a framework to assess the quality of HRIAs](#)
- **Comply with FPIC⁶** when their projects affect Indigenous peoples or customary land rights holders and demonstrate evidence of effective implementation.
- **Commit to transparency**, including project-level payment, contract and beneficial ownership disclosures in line with global standards such as the Extractive Industries Transparency Initiative (EITI), and other anti-corruption good practices.
- Have a clear statement of **policy on HRDs**.

States must:

- Hold companies **liable under civil law for human rights and environmental adverse impacts** in their global value chains and within their operations and business relationships. In cases of grave and widespread human rights violations, **criminal liability of companies** and/or responsible directors should be imposed provided they acted with intent.
- Ensure **robust public law enforcement** of all the above obligations by state authorities, providing proper resourcing, training and support for effective review and monitoring of the implementation of the measures adopted, including dissuasive sanctions in case of breach.

Q2 - Are you aware of any measures, both mandatory and voluntary, at national, regional, and international levels to foster business respect for human rights in the extractive sector, especially in the context of energy transition plans, programs and activities?

Oxfam supports normative and policy measures at regional and international levels to foster business respect for human rights, engaging with the processes that made them possible, in collaboration with partners at all levels:

- **EU Directive on the disclosure of nonfinancial and diversity information:** Oxfam and other organizations issued a Statement⁷ urging the European Commission to take action to improve the reporting obligations of companies on sustainability issues.

⁶ While FPIC is a distinct right of Indigenous peoples, Oxfam recognizes it as a best practice for safeguarding the rights of customary land holders and non-Indigenous communities living in/around operations; therefore, if a non-Indigenous community does not give its consent for a project, a company should also respect this decision.

⁷ Joint NGOs call to the European Commission: [“The European Commission must take action to improve the reporting obligations of companies on sustainability issues. Over 20 leading human rights, environment and anti-corruption organizations with an interest in improving corporate transparency have joined together to call on the European Commission to improve the legal framework for corporate sustainability reporting”](#).

- **EU Directive on corporate sustainability due diligence:** The Directive is still being discussed and at this moment it is unclear to what extent there will be an impact on operations in the extractive sectors. Oxfam and other organizations have taken positions on several elements of the legislation:
 - [Human rights obligations](#)
 - [Climate change](#)
 - [Corporate governance](#)
 - [Conflict and due diligence](#)
- With the EU Directives, States have an opportunity to take meaningful measures, but key elements at stake:
 - **Scope of companies:** the law should apply to all companies.
 - **Reversal of the burden of proof** to improve access to justice for survivors.
 - **Financial institutions:** banks and investors must be held responsible for bankrolling human rights and environmental violations.
- **The Escazu Agreement:** Oxfam issued a list of Recommendations to the 2nd Conference of the Parties to the Escazu Agreement⁸. These recommendations are largely relevant to all States, beyond the geographical scope of this specific treaty (see below).
- **Extractive Industries Transparency Initiative (EITI):** Oxfam participates in the EITI multi-stakeholder effort to promote good governance on extractive issues, including on energy transition issues such as extractive contracts and GHG emissions disclosure.
- **Initiative for Responsible Mining Assurance (IRMA):** Oxfam engages with IRMA, the only independent, third-party mine certification initiative governed equally by the private sector, local communities, civil society, and workers. We have engaged on issues like FPIC and gender.
- **International Council on Mining and Metals (ICMM):** ICMM’s standards address human rights issues and apply to its 20+ member companies. While its standards are important for the sector, there are some gaps in its existing policies and some companies have fallen short on implementation. ICMM published new Human Rights Due Diligence Guidance in May 2023.⁹

Q3 - What mechanisms or processes should exist at the State level to assess and ensure that extractive sector operations, including the production and distribution of transition minerals, do not impact negatively human rights?

In the absence of legislation, States should still direct their implementing agencies to align with these international norms around responsible business conduct. This means agencies should¹⁰:

- **Articulate clear support for the highest human rights and environmental protections**, and the need to reduce demand for new mining as a whole of government priority, and set targets and

⁸ Oxfam call to States parties (original in Spanish): "[Fortalecer las capacidades y mecanismos de protección de defensores/as de derechos humanos en temas ambientales en la COP2 del Acuerdo de Escazú. Buenos Aires, Argentina](#)"

⁹ [ICMM Publishes Updated Guidance to Support the Mining Industry to Proactively Manage Human Rights Impacts](#)

¹⁰ [Carbon Billionaires: the investment emissions of the world’s richest people](#)

timelines to increase circular economy solutions, shaping how the State invests its financial, technical, and diplomatic resources.

- **Institute robust gender responsive HREDD** in their dealings with companies in the clean energy supply chain, including State contractors.
- Provide preferential treatment to sustainable and inclusive companies that are **performing highly on sustainability criteria** in export credits and public procurement, designing tender processes including negative scores for large companies that are performing poorly on sustainability criteria.
- **Enforce policies to hold state-owned enterprises accountable to these standards.** This should include promoting access to remedy through judicial and non-judicial mechanisms.
- Ensure international **partnerships and trade agreements operate under the highest international standards** for HREDD and traceability.
- **Set measurable goals and performance metrics** that include, but not limited to, national recycling and reuse programs, and staff training on HREDD standards' compliance. Progress should be reported to the public.
- **Integrate community feedback** into decision-making processes for any State investments. Applications for government funding, supplier contracts, and supporting documentation should be disclosed with sufficient time and be accessible for rightsholders to provide public comments on the application prior to a decision being made.
- **Disclose their contracts with extractive companies** and ensure that contracts proactively include provisions that allow disclosure to the public.¹¹
- **Ensure that the guidance provided by donor governments to improve contract quality and negotiation capacity** references the emerging global norm on contract disclosure and best practice by governments and companies.
- **Support efforts to strengthen civil society** capacity to analyse and understand contracts.
- Ensure **social protection coverage and meaningful investments** in re-training for workers previously employed in the fossil fuel sector.

CORPORATE RESPONSIBILITY TO RESPECT HUMAN RIGHTS

Q9 - What roles should business enterprises in the extractive sector play to integrate human rights into ongoing energy transition plans and programs to address adverse human rights impacts? Please provide examples if possible.

To comply with their responsibility, businesses involved in the extractive sector and the clean energy supply chains must:

- Commit to respecting human rights through the **adoption of an integrated or stand-alone human rights policy**, recognizing and addressing gender inequality and risks faced by women, girls and gender non-binary people. They must **integrate the UNGPs into their existing policies** and suppliers' standards, including flow-down requirements for subcontractors.

¹¹ [Contract Disclosure Survey 2018 | Oxfam International](#)

- Develop a **thorough and coherent gender responsive HREDD approach** which includes:
 - a. Identify most salient human rights risks and gender impacts, what action they will take, when, how and with who.
 - b. Cover their entire value chain, from own operations at domestic level and abroad, to the suppliers of different tiers.
 - c. Be ongoing and recurring.
 - d. Consider the size of the company, risk of severe human rights impacts, and the nature and context of the operations.
 - e. Integrate **robust intersectional HRDD processes**, such as intersectional HRIAs, aligned with Guidance on Gender Dimensions of the UNGP¹² and complying with Oxfam’s [framework to assess the quality of HRIAs](#).
- Ensure **meaningful rights holder engagement** that is early, informed, facilitated, secure, inclusive and gender sensitive.
- **Adopt an explicit policy commitment to FPIC** and ensure implementation is adequately resourced. When FPIC processes are implemented by the State, commit to working collaboratively and ensure process is transparent and participatory and refrain from any direct or indirect interference that could be considered coercion or manipulation.

"The [fair] energy transition is not real if it is not built with the communities, less when it is imposed by the headquarters"¹³

As companies are transitioning to more sustainable energy sources, increased efforts are needed to avoid repeating the mistakes of the past such as moving projects forward without ensuring meaningful participation of local communities, securing FPIC or ensuring communities benefit from the investment. For example, in La Guajira, Colombia, groups and organizations have denounced the lack of participation of the communities in the different phases of the wind energy projects that are being carried out in the department.

Companies that obtain community consent insulate themselves from expensive conflicts that would threaten profits and, in some cases, make projects economically unfeasible, while defeating the very purpose of a just transition that would protect the people and the planet.

- **Disclose results of due diligence processes including HRIAs and environmental impact assessments and communicate how impacts are addressed**, including the impacts in company-owned operations and supply chain, plans to mitigate adverse impacts and plans to track effectiveness of measures and the results.

¹² Specific gender guidance is required as the gendered impacts of mining projects remain underestimated. See: Christina Hill et al., "[Position Paper on Gender Justice and the Extractive Industries](#)"

¹³ Oxfam Colombia, blog (original in Spanish): "[¿Que todo cambie para que nada cambie? Retos del modelo extractivo para la Transición Energética Justa?](#)"

- Establish gender-sensitive **project-level grievance mechanisms** aligned with UNGP efficiency criteria to ensure affected people can voice their concerns and have access to remedy, in a trusted process without retribution.¹⁴
- **Provide for and cooperate in the remediation of adverse impacts** in their global value chains and within their operations and business relationships.
- Commit to **protecting and upholding the rights of human rights defenders**.

Human and environmental rights defenders are at the forefront of the struggle for a just energy transition

Over 400 human rights defenders were killed in 2022 and, according to Global Witness, mining was the sector most linked to killings of land and environmental defenders in 2022.¹⁵

In “Threats to human rights defenders: Six ways companies should respond”, Oxfam developed key recommendations for how companies should respond to the threats facing HRDs.¹⁶

- **Recognize and commit to protecting the rights and legitimacy of HRDs** by adopting and disclosing a policy to protect their rights.
- **Implement robust HREDD mechanisms** across the value chain to enable the identification of risks to HRDs.
- **Establish grievance mechanism** accessible to HRDs, aligned with UNGP efficiency criteria.
- **Use their leverage and speak out in defense of HRDs** as well as against legal reforms that are aimed at restricting civil society space.
- **Engage with communities and local civil society** in inclusive, culturally and gender-sensitive ways to identify and address risks for HRDs; ensure the implementation of FPIC processes; and facilitate access to information relevant to the protection of HRDs.
- **Do not use or support strategic lawsuits against public participation (SLAPPs)** or other legal strategies that diminish established legal protections for HRDs.

As demonstrated in Oxfam’s report [“Carbon Billionaires: The investment emissions of the world’s richest people”](#), corporates, their directors and their shareholders can take actions without waiting for governments to legislate. Oxfam advocates for corporates to ensure that all workers are paid a living wage, and that as a company they are on course to meet the objectives of the Paris Agreement.

¹⁴ See UNGP principle 31: Effectiveness criteria for non-judicial grievance mechanisms.

¹⁵ Global Witness, [“Decade of defiance - Ten years of reporting land and environmental activism worldwide”](#)

¹⁶ [Threats to human rights defenders: 6 ways companies should respond](#)

Q11 - Have you seen extractive sector investors play a role in preventing and mitigating, or in exacerbating, negative impacts of energy transition efforts on human rights? Should investors be required to conduct gender responsive HRDD in meaningful consultation with local communities, civil society organizations, Indigenous Peoples, and human rights defenders? What remediation responsibility should investors have?

In a recent report [“Towards a Just Energy Transition: Implications for communities in lower- and middle-income countries”](#), Oxfam shows how **donors, private investors and companies play an important role in financing and implementing clean energy solutions**. Furthermore, in the report **Carbon Billionaires**, cited above, Oxfam urges investors to:

Specifically, investors should:

- **Commit explicitly to a scenario of a maximum 1.5°C of warming** and adopt an action plan to achieve net zero by 2050.
- **Not finance any new extraction of fossil fuels, coal-fired power generation, or oil from tar sands in high-income countries**, including in the Arctic (both onshore and offshore). In lower- and middle-income countries, finance should be limited to projects which demonstrate that the public benefits exceed the costs of extraction, taking into account the risk of potentially stranded assets. Investors must also define a credible phase-out strategy for fossil fuels as a whole.
- **Improve the way they measure the carbon footprints** of their financing and investment portfolios.

More generally, all investors should ensure that the companies in their portfolios:

- Develop a thorough and coherent HREDD approach.
- Integrate robust and gender responsive HREDD activities, such as HRIAs, that will enable the company to identify and mitigate human rights risks.

The Emerging Market Investor Alliance has taken some measures to promote human rights principles among investors, such as developing investor guidance on FPIC and an investor questionnaire on community engagement, FPIC, and community development agreements.

ACCESS TO REMEDY

Q 15 - What measures and mechanisms should be provided by extractive sector legislation, bilateral investment treaties, concessions, and contracts to allow individuals or communities affected by extractive activities to seek effective remedy for business-related human rights abuses? What remedies are best suited?

STATES

Oxfam's [Recommendations to the 2nd Conference of the Parties to the Escazu Agreement](#)¹⁷ are highly relevant for the protection of HRDs and access to justice beyond the geographical scope of the treaty. States must:

- Implement properly funded **protection mechanisms** to guarantee the rights of HRDs and provide for a **specific protection for women defenders**, recognizing gender violence as a frequent type of attack.
- **Prioritize measures for the recognition and titling of Indigenous territories** as a measure to prevent attacks and violence against HRDs.
- **Strengthen the effective participation of civil society in protection mechanisms**, ensuring adequate training, transparency, and access to pertinent information handled by institutions and companies.
- **Guarantee transparency and effective access to information**, both locally and nationally, as well as the effective access to justice especially in cases of defense of rights and integrity of human life and of nature.
- **Create or strengthen existing institutional mechanisms with specific knowledge in environmental and human rights matters**; this would allow the possibility of filing precautionary measures for the protection of HRDs and community-managed land.

COMPANIES

Companies must:

- Establish a grievance mechanism which¹⁸:
 - **Complies with UNGPs efficiency criteria.**
 - **Are accessible to workers and affected communities** to report instances of repression and ensure proper investigation and response to the grievance.

¹⁷ Oxfam call to States parties (original in Spanish): "[Fortalecer las capacidades y mecanismos de protección de defensores/as de derechos humanos en temas ambientales en la COP2 del Acuerdo de Escazú. Buenos Aires, Argentina](#)"

¹⁸ [Threats to human rights defenders: Six ways companies should respond](#)

- **Requires a level of Board oversight** and must ensure effective follow-up with adequate resources.
- **Are accessible to all subcontractors** and ensure that it is incorporated into their operations.
- Have an **open-door dialogue approach** to try to resolve conflicts or disagreements with HRDs before those conflicts escalate into serious abuses. Where community rights have been violated, companies must use all the tools at their disposal to support accountability and redress.
- Be **transparent and disclose** the complaints received as well as how procedures were handled (except if specifically asked not to do so).

Q17 - Are you aware of any cases submitted to judicial and/or non-judicial instances (e.g., national human rights institutions, national contact points, mediation, etc.) regarding business-related human rights abuses in the extractive sector, particularly in the context of energy transition projects?

- In 2019, les Amis de la Terre along with 6 Ugandan civil society organizations brought a case against the **East African Crude Oil Pipeline (EACOP)** before the interim relief judge. Following a lengthy procedural battle, the court decided that the case should be heard by the French Supreme Court (*i.e.*, France’s highest court for civil matters). The highly expected verdict (first case using the French law on duty of vigilance) was issued on February 2023. The Paris Court considered that the CSOs’ legal action was inadmissible because their current claims were « *substantially different from the claims*” made in the initial formal notice sent to the defendant.¹⁹
- On February 2023²⁰, Oxfam France, Friends of the Earth (Les Amis de la Terre) France and Notre Affaire à Tous, who had given **BNP Paribas** formal notice to comply with its due diligence obligations on 26 October 2022, sued BNP Paribas over its massive support to fossil fuels and for its substantial contribution to climate change. BNP Paribas is Europe’s largest and fifth worldwide funder of fossil fuel expansion: the three organizations urge the bank to immediately stop financing this expansion and to adopt an oil and gas exit plan. This is the world's first climate lawsuit against a commercial bank. A summons has been issued because BNP Paribas fails to comply with the French duty of vigilance law and still refuses to stop financing the expansion of fossil fuels, an urgent call from the scientific community. The Paris Judicial Court will propose a schedule for the next steps in the proceedings.
- The Amadiba Crisis Committee (ACC), with the support of Oxfam South Africa and joined by many organizations and citizens and activists, is protesting the planned three-dimensional seismic survey in search of oil and gas deposits from Morgan Bay to Port St Johns off the Wild Coast,

¹⁹ Total’s Tilenga [and EACOP Projects: the Paris Civil Court dodges the issue](#)

²⁰ [French NGOs take BNP Paribas to court in world’s first climate lawsuit against a commercial bank | Oxfam International](#)

South Africa²¹. As detailed in a [press release](#) published by Oxfam’s ally, Natural Justice, a court case, was filed by various organizations²² seeking to review the decision by the Department of Mineral Resources and Energy to grant to **Shell and Impact Africa** the exploration rights which would allow them to conduct seismic surveys off the Wild Coast of South Africa, searching for oil and gas. The applicants argued that the right should not have been granted due to the absence of community consultation and insufficient assessment of impact on livelihood, cultural and spiritual rights among other arguments. On September 1, 2022, the Makhanda High Court found in favor of the applicants on all the grounds of review and set aside the decision of the Department of Mineral Resources and Energy.²³

- In Guatemala, the Constitutional Court suspended the **Escobal silver mine** in 2017²⁴ and the Fenix nickel mine in 2019²⁵ due to inadequate implementation of community consultation with Indigenous peoples neighboring these mines.

²¹ Oxfam South Africa, statement: “[REJECT OIL AND GAS EXPLORATION, SAVE OUR OCEANS!](#)”

²² Organizations include Sustaining the Wild Coast NPC, Wild Coast communities, Wild Coast small-scale fishers, and All Rise Attorneys for Climate and the Environment NPC, represented by the Legal Resources Centre (LRC) and Richard Spoor Attorneys. Natural Justice and [Oxfam South Africa](#) who are partners to the African Activists for Climate Justice project and Greenpeace Africa joined the court case and were represented by an environmental law firm, Cullinans, and Associates.

²³ Daily Maverick, article: “[Activists celebrate big win for Wild Coast against Mantashe and Shell](#)” (2022)

²⁴ <https://www.mining.com/tahoes-escobal-mine-licence-remain-suspended-guatemalan-court/>

²⁵ [Guatemala court upholds request to suspend work at huge nickel mine](#)

Annex - Previous Oxfam's submissions

- [Gender Lens and the UNGPs \(2018\)](#)
- [Guidance for companies in relation to HRDs and civic space \(2020\)](#)
- [UNGPs 10+ / Next Decade BHR consultation \(2021\)](#)
- [COVID-19 pandemic: lessons learned and moving forward \(2022\)](#)