

## STRATEGIC PLAN 2013-2016

### 1. Our vision and mission

Our vision is of a sustainable world in which corporations' drive for profit is balanced by the interests of society at large and respect for human, social and environmental rights.

By working together at the European level, the members of ECCJ aim to develop a common vision of corporate justice and build capacity among civil society organisations to influence policies and regulation to improve Corporate Accountability.

### 2. Our key principles for Corporate Accountability

- Corporate Accountability should be based on internationally agreed human rights, social, labour and environmental standards and principles for corporate behaviour.
- Although voluntary initiatives can be successful in some cases, regulatory measures are necessary to ensure all corporations abide by national and internationally agreed standards, whichever provides the highest standard.
- Stakeholders' rights are fundamental to Corporate Accountability. Stakeholders need to be able to exercise these rights in order to hold companies to account for their impacts and to challenge companies and their directors to uphold their duties. A basic prerequisite for this is systematic internal and external dialogue processes; stakeholders should be involved in the development of companies' strategies and policies from an early stage.
- Voluntary Corporate Social Responsibility initiatives can only be effective and credible if they include mechanisms for independent monitoring and verification of their claims, and mechanisms of redress for those adversely affected by corporate activities.
- Corporate Accountability requires consistently high levels of transparency around business activities and products. This implies mandatory social and environmental reporting, disclosure of payments, subsidies and lobbying vis-à-vis public authorities, and 'a right to know' for consumers' and other stakeholders' regarding the production process, products and services.
- Improving business' impact requires changes in companies' core business activities, throughout their supply chains. It also requires responsible behaviour to be internalised throughout corporate governance, strategies, purchasing policies and business models, to meet the standards set in existing agreements.

### 3. ECCJ's Strategic Priorities for 2013-2016

ECCJ's ultimate goals are to ensure that corporations are accountable for their social, environmental and human rights impacts, and to enable those whose lives are negatively affected by the operations of EU-based companies to exercise their rights. ECCJ aims to change EU and Member States' policies and rules in order to address the root causes of business' negative impacts.

The following **long term goals** and **four year objectives** build on the learning from our previous strategic plan, a thorough analysis of the context, challenges and opportunities (see annex) and consultation with the ECCJ membership. Each objective is constructed as a step towards the stated goal.

The strategic plan is intended as a catalyst to encourage planning and development by the Steering Group and the Secretariat. It allows for flexibility and innovation to accomplish the stated goals and objectives, and to adapt them to changing political contexts.

## **A. POLICY GOALS**

### **Goal #1: Corporate liability**

**Goal: The EU and Member States introduce legislation to hold companies accountable for the adverse social, environmental and human rights impacts that result both from their own activities and those linked to them via their business relationships including their supply chains**

*What is the issue?*

ECCJ aims to bridge two major regulatory gaps: absence of parent company liability for abuses caused by their subsidiaries; and lack of legal requirements for adherence to human rights and environmental standards in the supply chain.

EU-based multinational enterprises often operate through myriads of subsidiaries and utilize complex supply chains, yet in principle they don't bear any liability for harm caused in third countries by actions that they haven't directly committed, aided or abetted. The lack of a legal status for multinational enterprises<sup>1</sup>, the absence of a legal framework directly governing corporate human rights responsibilities and the existence of major jurisdictional obstacles, represent barriers to holding European companies legally responsible for abuses which occur overseas. This means that EU-based parent companies can benefit, with impunity, from harmful practices carried out in countries with dysfunctional judicial systems and poor rule of law.

Efforts at legal reforms to address these issues face major political obstacles, as they touch on basic corporate privileges and the sensitive issue of extra-territorial obligations. However, recent scandals have drawn attention to the need to address parent company liability. Several recent legislative initiatives, such as the timber regulation requiring due diligence or the law making parent companies responsible for the prevention of corrupt practices by their subsidiaries abroad aim to address aspects of the problem.

The UN Guiding Principles on Business and Human Rights (UNGPs) represent an opportunity to re-open the discussion. Pillar II of the UNGP framework describes the corporate responsibility to respect human rights, with 'Human Rights due diligence' (HRDD) outlined as the main tool via which corporations can discharge this responsibility. The UNGPs spell out very clearly that businesses should identify and address any violation which is linked to them through their operations or business relationships. While pillar I of the UNGPs sets out that States have a duty to protect against human rights violations, it stops short of specifying how States, and in particular home States should embed an HRDD requirement for businesses into government policy and national law. An analysis of regulatory practice commissioned by ECCJ and US-based organization ICAR in 2012 outlined options and principles for States' implementation in this area.

ECCJ's approach is to address the general legal framework. However, depending on opportunities or in reaction to scandals, ECCJ could develop demands or support other CSOs' demands that are sector-specific (conflict minerals, financial sector, cocoa...), impact-specific (specific human right, environment, tax evasion...) or country specific.

**Objective 1: The EU and Member States identify the legal gaps to achieving corporate accountability; they recognize and define the regulatory role of States in enhancing corporate accountability; they identify legal and policy options available to them that include some of ECCJ's key propositions**

There are several ways to strengthen corporate liability. ECCJ will continue to pressure decision makers to acknowledge the obligations of States to protect human rights and the environment from irresponsible corporate activities, wherever those activities occur. ECCJ will also identify the policy and legislative reforms that would contribute to enhanced corporate accountability. Possible reforms include – but are not limited to – implement HRDD

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This is a concept known as 'the corporate veil'; i.e. the concepts of separate legal personality, limited liability for shareholders and the ability for the company itself to become a shareholder in other companies, which together insulate each legal unit of the multinational company, including the parent company, from obligations of and to other members of the economic group

in law; the recognition of parent company liability in company and civil law; product based liability; environmental liability; changes to the criminal regime; public procurement; export credit agencies, etc. Several political or policy papers - such as EU and Member States plans on CSR and the UNGPs, EP resolutions, Commission Communications or Green Papers, etc. - represent opportunities that ECCJ could prompt or seize in order to achieve this objective.

**Objective 2: The EU and Member States take steps to recognize parent company liability in law by creating a legal duty requiring companies to carry out human rights due diligence(i.e. to identify, prevent and mitigate impacts connected to them by a business relationship), backed by administrative, civil and/or criminal sanctions**

Implementing HRDD in law can aim to address all situations of corporate abuse, or can be limited to address specifics, for instance certain products or impacts. In order to implement HRDD, States can either impose an HRDD duty through civil liability, criminal liability or administrative law, or support an HRDD duty through guidance, transparency requirements, public procurement rules, export credit agencies etc.

**Objective 3: The EU and Member States ensure other major policy and legal reforms that affect business operations contribute to enhancing respect for human rights and the environment**

ECCJ will monitor the key policy and legal reforms initiated by the EU and assess their potential to enhance corporate accountability. In addition to the broad scope of sector-specific, impact-specific or country-specific reforms, two policy areas are considered important. First, full consistence with the obligation to protect human rights and the environment should be promoted in cases where business enterprises are owned or controlled by the State, receive substantial support and services from State agencies such as export credit agencies and official investment insurance, guarantee agencies, or aid and development agencies, in case of public procurement, or when enterprises enjoy other commercial benefits and advantages (i.e. trade missions, diplomatic services) or receive funding from European public financial institutions. Second, corporate governance and company law reforms should also provide opportunities to change the basis for corporate decision making and reform fiduciary duties in order to improve companies' and directors' public accountability.

## **Goal #2: Corporate transparency**

**Goal: The EU and Member States require mandatory disclosure of key information on companies' activities and those of their business relationships, including their supply chain; the major risks and impacts these activities have on society; and how companies identify, prevent and mitigate these risks and impacts. The EU and Member States ensure that companies' stakeholders have access to information that is useful in asserting their rights**

*What is the issue?*

Transparency is the first step towards corporate accountability but so far little has been achieved to improve the legal framework. Lack of transparency is a major factor inhibiting corporate accountability and responsible business behaviour. If the right information is not collected, analysed and duly disclosed, it is difficult for governments, affected people, the general public, employees, consumers, investors, or even the management of these companies, to understand the scope and impact of corporate operations on society.

Multinational enterprises are complex entities operating through myriads of subsidiaries and subcontractors, and parent companies too often shirk responsibility for the wrongdoings of their subsidiaries. In order to improve accountability along the value chain, transparency should be increased on companies' social, environmental and human rights risks and impacts and how companies identify, prevent and mitigate them.

In addition to proactive disclosure of certain types of information, it is essential in a democracy that people can access information to enable them to participate in a real and effective way, in the matters that affect them. The right to access information held by companies which affect rights-holders and their environment should be guaranteed.

**Objective 1: The EU and Member States introduce a simple, harmonised and enforceable framework for mandatory disclosure of the way in which large companies identify, prevent and mitigate the social, environmental and human rights impacts resulting from their own activities and those directly linked to them via business relationships and their supply chains**

The proposed legislative reform on non-financial reporting could be a major milestone towards improving corporate transparency. ECCJ has been instrumental in pressing for this measure since 2008. In 2013 and 2014, ECCJ and its members will engage in a joint advocacy campaign to influence the EU and Member States to ensure that the reforms are robust. In addition, over the next four years, ECCJ may seek to influence other sector-specific reforms – for instance in high-risk sectors such as conflict minerals – addressing corporate transparency.

**Objective 2: ECCJ identifies what steps the EU and Member States can take to introduce an ‘access to information right’ on companies’ activities and raises awareness among decision makers of the options available to them**

Right of access to information provisions are complementary to mandatory and proactive disclosure requirements. Recently the right to know has been strengthened in the EU and in several Member States. But this right relates to information held by public bodies; it doesn't encompass access to information held by companies, who can conceal lots of information from their stakeholders (workers, suppliers, local communities, investors, customers). ECCJ will develop collaborations to investigate the legal and practical obstacles to reform, and to identify what options are available to EU and Member State decision-makers to enable rights holders to access certain categories of corporate information.

### **Goal #3: Access to justice**

**Goal: The EU and Member States ensure affordable and effective access to remedy for those affected by human rights and environmental abuse by European companies or their business relationships**

#### *What is the issue?*

The right to access an effective remedy is fundamental. Justice for victims is also a strong deterrent against harmful acts by corporations. If potential victims have real ability to assert their rights then corporate executives take environmental and social concerns much more seriously. The duty of states to ensure access to remedy and the fundamental position of judicial remedy is clearly spelled out in Pillar III of the UNGPs. However, the EU and Member States have so far ignored this issue. Victims often have to rely on civil / tort action because the extra-territorial dimension, lack of jurisdiction and missing legal frameworks can prevent public authorities in home states prosecuting corporate wrongs which occur outside of their borders. Nevertheless, even civil actions are scarce and the existing practice of foreign direct litigation (as seen in the UK) is now under threat.

The range of obstacles that deter people from claiming their rights is broad and diverse. They include:

- Lack of legal standards for parent company liability and supply chain responsibility
- Unavailability of models for financing cases, such as class actions, success fee arrangements and their recoverability from the defendant, and exemplary damages.
- Jurisdictional limitations, which in some countries make it impossible to sue a foreign subsidiary of home-based parent company

While various options available for strengthening both judicial and non-judicial remedies, the latter can never replace the former. Too often, existing non-judicial mechanisms do not satisfy the requirements of the right to an effective remedy which includes the right to reparation, as per international law.

ECCJ needs to face a political context that is not favourable. First, the access to justice by foreign victims is part of broader agenda of the organisation of the judicial system. From policy-makers perspective it is small and unimportant issue, yet difficult due to its extraterritorial consequences. Second, it is complex and technical which makes it difficult to understand for policy-makers, CSOs and the wider public.

**Objective 1. ECCJ identifies what steps EU and Member States can take to introduce effective measures for access to judicial remedy for those affected by human rights and environmental abuse by European companies or their business relationships. ECCJ mobilizes political support among EU and Member States policy makers for these measures**

As a first step, ECCJ in cooperation with ICAR will develop a study to analyse the main obstacles and opportunities for foreign victims to access justice in the EU, and identify effective solutions and recommendations. ECCJ will also gather evidence (cases) on the current obstacles to access to remedies, and share it with policy makers. As a second step, ECCJ will share the conclusions of the study with European Institutions and Member States, raise policy makers' awareness and seek political recognition of the need for reform.

**Objective 2. The EU, Member States and International Institutions take steps to alleviate the legal and practical obstacles to justice; they put in place a legal framework which gives affordable, easy access to the courts for victims of EU-based multinationals, and NGOs and citizen associations seeking to enforce corporate obligations and seek remedy on behalf of public interests and affected people**

As a third step, a campaign would be launched to promote targeted and appealing reforms, building on the conclusions of the ECCJ-ICAR research project and consultation with CSOs.

In addition, ECCJ will assess the potential of ongoing reforms (such as collective redress (allowing victims to pursue joint claims in class actions); misleading advertisement (improving the ability of citizen associations to fight green-washing and fair-washing); harmonization of the rule of private international law (Rome II) etc.) to improve access to justice and if relevant, work to influence these reforms.

## **B. INTERNAL DEVELOPMENT GOAL**

### **Goal #4: Strengthen the Coalition and the Secretariat**

**Goal: ECCJ is strengthened as an effective, participative, and member-driven coalition where European organizations align their strategies and build their capacities to influence policies at national and European levels. The ECCJ secretariat is empowered to coordinate the actions of the coalition and achieve its policy objectives**

#### *What is the issue?*

ECCJ has 21 members in 15 European countries<sup>2</sup> representing over 300 organisations. This diverse membership brings various perspectives, skills and a strong in-house expertise.

ECCJ has gained recognition as a coalition. By creating synergies, reaching out to key actors and creating the structure for collective action, the ECCJ network has shown its potential to have greater impact than isolated organisations. The current legitimacy and credibility of ECCJ and its impact in influencing EU policies are largely due to the weight of representing such a large and diverse group of NGOs, the capacity to develop high quality joint proposals and to act simultaneously to promote them. In other words, the representation function of the network is essential to our success.

This Strategic Plan aims to enable ECCJ to better mobilize European CSOs under unified advocacy strategies. Since Member States remain very prominent in the EU decision making process, national- and Brussels-based strategies need to be better aligned and specific activities have to be developed to ensure members' involvement. ECCJ's ability to link up work at the national and European levels is its greatest strength. Achieving this link-up is

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<sup>2</sup> ECCJ has members in 13 EU Member States – Austria, Belgium, Czech Republic, Denmark, France, Finland, Germany, Italy, The Netherlands, Poland, Spain, Sweden and the United Kingdom – and 2 non-EU countries – Norway and Switzerland.

also a significant challenge for ECCJ, as the primary focus of many member organisations is national action, with some members lacking the capacity to engage in joint European advocacy work.

Efforts will be invested in creating an environment favourable to trust and collaboration, enhancing coordination capacities and improving participative channels. Our aim is to increase the mobilisation capacity of the coalition and its members and ensure greater participation in coalition decision-making and activities, resulting in a stronger and more visible coalition which has greater impact in the EU process. This will enable the coalition to develop joint strategies for ECCJ and its members, and better align their objectives and activities. Coalition strengthening is a cross-cutting concern and therefore will be integrated as much as possible into all ECCJ priorities and activities.

Finally, a strong and stable secretariat is essential to fulfilling our mission and goals. In 2010, ECCJ completed the process of becoming a legal entity which was crucial to our long term financial sustainability. However, over the last few years, the ECCJ has struggled to secure the long-term income necessary for delivering on all its objectives.

**Objective 1. Member organisations are actively engaged in ECCJ's work**

In order to influence the EU policies more effectively, the ECCJ will ensure a strong engagement of the current membership, with a particular focus on strategic EU member states (such as the UK, France, Germany). It will also improve its ways to involve more organisations and platforms and develop more structured alliances with key NGOs/stakeholders. An option is to create a new status of ally next to the existing status of member. This will increase ECCJ's representation, expertise and advocacy outreach; as well as allowing more organizations to get informed about and involved in EU policy issues.

**Objective 2. The internal and semi-internal communication channels are enhanced to allow members to benefit from relevant, accessible and timely information**

**Objective 3. ECCJ members increase their participation in the development of joint strategies and the implementation of coordinated actions**

Internal communication (objective 2) is essential to enhance participation. In addition, specific spaces and channels will be proposed or improved to enable engagement, exchange, better integration of the needs of the members, better use of the in-house expertise and skills, and participation in joint activities. Capacities of the members will be built through specific material, training, skill sharing and mutual learning, based on an identification of the needs of the members. Working groups and workshops have proved to be good ways of involving the members and making them more familiar with EU decision making processes and sometimes complex legal issues. Equally, there spaces for participation will allow the ECCJ to build the existing experience, expertise and skills of its members and better include their demands and propositions in the development of joint strategies and actions. There will be a stronger ownership of the coalition. This will result in a broader mobilization and each member participating to at least two ECCJ actions, i.e. working group, event, lobby action at EU or Member State level, etc.

**Objective 4. The governance system is strengthened to ensure a more participative, effective and transparent decision making process under the leadership of the Steering Group**

The roles of the General Assembly, the Steering Group and the Secretariat have been defined in the ECCJ governance rules in 2011. Terms of reference are developed when a Working Group is created. However, while clear structures and decision making processes are needed, flexibility must also be guaranteed as this is the nature of a coalition. The Steering Group will assess the coalition governance processes and will find innovative ways to foster participation and consultation on important decisions. It will also encourage and support members to develop projects with and on behalf of ECCJ, based on clear and agreed mandate.

**Objective 5: The Secretariat has ensured long-term stability by strengthening its financial resources and ensuring adequate human resources with at least two permanent staff members**

The ECCJ will ensure that it has the financial and human resources required to strengthen its coordination capacities. Previous years have shown that at least two permanent staff members are needed to carry out the current mission. The human resources policy should ensure participation and trust, and an open and constructive relationship between the staff and the Steering Group. A proactive fundraising plan will be developed to secure income from diverse sources (public and private funding, membership fees). As a complement, the support of ECCJ members to the work of the secretariat in relevant areas (i.e. communication, campaigning, legal expertise etc) will be reinforced. In the long term, ECCJ should seek to become independent of Friends of the Earth Europe, which currently hosts the ECCJ secretariat.

#### **4. ECCJ's strategies to achieve its policy goals**

ECCJ will strengthen its ability to both set the agenda and to react to external developments. Agenda-setting means opening up space for issues that are not addressed by legislators, raising awareness among policy makers, mobilizing a large coalition of organizations, etc. Reactive work includes responding to existing short-term legislative opportunities, debates and consultations in line with achieving our objectives and goals.

ECCJ will continue to position itself as an expert organization, able to provide detailed legal proposals. However, over the next four years ECCJ will improve the accessibility of its positions and its outreach to a greater non-expert audience (policy makers, CSOs, media and public). Catchy, hard-to-dispute issues that have potential for broader mobilization or campaigning will be identified. ECCJ should achieve an interim success in a smaller campaign that would open the door to campaigning on systemic issues. A smaller campaign could focus on a specific issue or sector, or a particular Member State.

ECCJ will combine different advocacy strategies to achieve its policy goals. This set of strategies should be seen as a toolkit available to ECCJ, to be used with flexibility depending on the policy issue and the different stages of the decision-making process. Some issues require more public campaigning and a broader range of allies (for example, influencing the European Parliament) while others require work with experts (for example, influencing internal debates in the Commission).

These strategies are as follows:

##### **1. Elaborate policy recommendations**

ECCJ will seek to be forward-looking and set the agenda at EU level. It will help to frame the issues for CSOs, policymakers and the public, and to promote systemic solutions to the root causes of problems. ECCJ will also monitor EU corporate accountability policies and react to opportunities or threats at EU level. In order to keep its demands credible and grounded in the political, legal and economic reality of the EU, ECCJ will undertake expert research and consult with members to elaborate concrete policy recommendations and legal proposals for each of its three goals, as a basis for its advocacy with policy makers.

##### **2. Provide convincing evidence justifying the need for change and the value of the regulatory approach**

ECCJ should work with its members and allies to collect examples, cases and statistics and make them publicly available. Decision makers are very sensitive to cases— especially when they involve companies in their country. They will be regularly updated about the ongoing cases of adverse impacts of European companies, provided by European CSOs. These cases will illustrate our messages and reinforce our recommendations by showing the persistence of a systemic problem that requires robust solutions.

ECCJ will also work with allies – such as Alter-EU and its members – to expose concrete cases of business lobbying against specific policy reforms for corporate accountability and transparency.

When ECCJ is advocating for concrete policy reform, it should also uncover how current policies are failing and expose the wasteful use of resources by the Commission.

More than ever, we need to make the arguments for regulation on fundamentals. A study will be conducted to break down common myths such as, “cutting red tape is the only path to economic growth” and “voluntary approaches are the most efficient way to enhance corporate responsibility”.

ECCJ will also regularly feed concrete cases to journalists. This should create opportunities to work with leading newspapers to highlight corporate irresponsibility and the insufficiency of the current voluntary approach, and to present ECCJ’s policy recommendations.

### **3. Engage with policy makers**

In order to effectively influence the EU, it is essential to engage at different levels: the Commission (Commissioners, Cabinet, policy officers), the European Parliament (MEPs, Committees, staff) and Member States (governments, Permanent Representations).

ECCJ seeks to widen and strengthen the support base for its proposals in EU institutions and develop a constructive and effective partnership. ECCJ will develop working relations with several key players within the different EU institutions and agencies; reinforce its identity as a large coalition representing European CSOs in 15 countries; improve its capacity to produce accessible and targeted position papers and briefings. A key element for success is to better align the members’ strategies at EU and Member States levels, since opposition to progressive proposals often come from those Member States with major industries.

#### *Engaging with the European Parliament*

In order to build upon its base of allies within the EP and open up political space for corporate accountability, ECCJ will have regular contacts and meetings with MEPs. ECCJ will promote the creation of an intergroup of MEPs who have a shared interest in business and human rights. ECCJ will use the EP elections in 2014 and possible joint campaigns with other coalitions to create a debate about corporate accountability and put it on political groups’ and candidates’ agendas, while at the same time identifying future parliamentary supporters.

#### *Engage with the Commission*

In seeking to strengthen its credibility vis-à-vis the Commission, ECCJ proposals must remain concrete, and legally and technically accurate. ECCJ will adopt a critical yet constructive position, however, should the Commission fail to take the issues seriously, ECCJ would consider taking a more confrontational approach.

#### *Engage with the Council (Member States)*

ECCJ seeks to strengthen its advocacy vis-a-vis the Council. A special focus will be given to defining and implementing a more articulated advocacy approach towards Member States. Also, in some issues outside EU competence, ECCJ could coordinate the work of key member organisations.

### **4. Engage in cross-cutting policy processes and debates that have potential to enhance corporate accountability**

In addition to the policy reforms that directly impact on one of our three goals (see chapter 3), ECCJ has identified three major policy processes that provide opportunities for progress towards corporate accountability. Over the next few years, ECCJ may consider following or initiating other processes.

#### *Implementation of the UNGPs by the EU and the Member States*

ECCJ will maintain pressure on decision makers to address all three pillars, with a focus of the neglected issues of State duties and access to remedies. ECCJ will also support the work of its members at national level on this issue.

#### *Follow-up to the CSR Communication*

ECCJ will make use of its participation in the Coordination Committee of the Multi-Stakeholder Forum on CSR to share concerns and recommendations on the EU strategy on CSR so that this strategy contributes to a stronger legal framework for corporate accountability.

#### *Engage in the debate on the purpose of corporations*

The Commission has proposed to initiate an open debate on the role and potential of business in the 21<sup>st</sup> century. ECCJ will bring insights to this debate, ensuring it is framed in a way that scrutinises the very purpose of corporations



and the myth of maximising shareholder value. ECCJ and its members will explore how to bring NGOs, governments, business and the academic community together and facilitate an open and fully informed discussion, resulting in greater awareness of the problem and recognition of the possible changes.

#### **5. Build alliances for a European wide movement for corporate accountability**

Policy change won't be achieved by ECCJ alone. Both ad-hoc and long term collaborations are needed. ECCJ will build links and explore options for joint action with key organizations at EU level, such as NGOs working on related topics (human rights, environmental protection, extractive industries; supply chain issues; specific country situations; trade and investment , public procurement, ECAs, decent work, etc.); trade unions; consumer organizations; socially responsible investors; national human rights institutions.

A specific focus will be placed on strengthening the global corporate accountability movement, in collaboration with the US-based International Corporate Accountability Roundtable (ICAR). This will contribute to highlighting particular problems and solutions through international studies (such as the study on access to justice) and aligning the asks and strategies of civil society in different regions.

ECCJ will not develop a formal partnership with business. Rather, it will seek to uncover and confront the adverse impacts of corporate operations on rights-holders, the positions of business on corporate accountability and their powerful influence on EU decision-making. However, on an ad-hoc basis, dialogue and collaborations with progressive business will be considered, in order to build support for our policy demands and to show that the business voice is not limited to BusinessEurope.

#### **6. Reach out to the media and raise awareness among European citizens**

The need to give more visibility to ECCJ's work is essential. Decision makers are sensitive to the media, to public pressure and to scandals. It is also easier to engage ECCJ members and allies, as well as donors when ECCJ's actions are visible. Finally, it is important to raise public awareness of irresponsible business behaviour and potential solutions, to support our advocacy work.

ECCJ will develop a communication strategy, including processes and useful material, to improve its capacity to communicate with the media and the public, taking into account the limited resources. Priority will be put on visibility in major European-wide and Brussels-based media at key moments and support members to do the same at national level. In order to get articles, interviews and op-eds in these media, ECCJ will more regularly use scandals involving European companies to raise media profile and put issues on the political agenda; and will link up to ongoing policy developments that have particular relevance for corporate accountability issues.