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Geneva

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**Note Verbal No. 115**

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland presents its compliments to the Office of the United Nations High Commissioner for Human Rights and has the honour to submit its response to communication AL GBR 2 2025, further to the letter dated 12 March 2025 from the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes.

The Permanent Mission of the United Kingdom of Great Britain and Northern Ireland avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 06 May 2025

Special Procedures Branch  
Office of the High Commissioner for Human Rights



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Geneva

## United Kingdom of Great Britain and Northern Ireland

### **Response to Special Procedure communications AL GBR 02/2025 of 12 March 2025 sent by the United Nations Human Rights Special Procedures, the Special Rapporteur on the Implications of the environmentally sound management and disposal of hazardous substances and wastes.**

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Thank you for your letter of 12 March 2025 regarding the packaging practices of Coca-Cola Europacific Partners Plc.

#### **1. Please provide any additional information and/or comment(s) your Excellency's Government may have on the above.**

The UK Government remains committed to the environmentally sound management and disposal of hazardous substances and waste.

In this context, the UK Government is sponsoring the Circular Economy for the Recovery of Waste Transition (CERO) programme in Samoa delivered by the UN Development Programme. The outcomes from the first phase of CERO (completed in March 2025) have reinforced the Government of Samoa's national policy framework and capacity to recycle plastic waste, including the introduction of a new, sustainable and innovative recycling process, raised public awareness and participation in plastic recycling through a schools education programme (initially leading to 6 tonnes of waste plastic being collected for recycling) and recommended measures to create safer, more inclusive and diverse circular economy workplaces.

More broadly, the UK Government is clear that it expects all UK businesses to respect human rights and the environment throughout their operations and supply chain relationships, in line with the OECD Guidelines for Responsible Business Conduct and the UN Guiding Principles on Business and Human Rights.

#### **2. Please provide information on the measures that your Excellency's Government has adopted, or intends to adopt, to reduce the negative impact of plastics on the environment and health, including through the practices and commercial activities of companies domiciled in your country, such as Coca-Cola Europacific Partners Plc.**

Plastic is a very useful material that can be the best environmental choice provided it is used and disposed of correctly. This government is committed to moving to a circular economy for plastics – a future where we keep our resources in use for longer, waste is reduced, we accelerate the path to net zero, we see investment in critical infrastructure

and green jobs, our economy prospers, and nature thrives. We will publish the first ever Circular Economy Strategy for England this Autumn. It will include a series of roadmaps detailing the interventions that the government and others will make on a sector-by-sector basis. One of the five sectors we will start with is the chemicals and plastics sector.

The government recognises the scale and impact of plastic pollution on the environment and is focused on preventing and reducing plastic and other litter entering the environment.

Our Collection and Packaging reforms, which apply to all materials, will improve the way we manage our plastic waste. Extended producer responsibility for packaging aims to shift the packaging choices of businesses, charging producers for the cost of managing their packaging material and thereby incentivising the use of less packaging and more recyclable packaging. Simpler Recycling (links [here](#) and [here](#)) will make recycling easier and ensure there is a comprehensive, consistent service across England. This will reduce confusion, improving recycling rates, ensuring there is more recycled material in the products we buy, and the UK recycling industry will grow. The introduction of a Deposit Return Scheme (link [here](#)) will incentivise the return of drinks containers to reduce littering and provide an uncontaminated stream of recyclable material.

We recognise that plastic pollution is a global problem, which is why the UK is one of the leading countries pushing for an ambitious international agreement to end plastic pollution by 2040, one that tackles the full life cycle of plastics and promotes a circular economy, where we reduce waste and clean up our environment. Addressing the full lifecycle of plastic, including through measures tackling single use plastics and improving the design of plastic products, is critical to ending plastic pollution.

We have a number of bans and restrictions on unnecessary single-use plastic products and will be banning the supply and sale of wet wipes containing plastic.

Recently the UK Government also supported WRAP (the Waste and Resources Action Programme) to launch a pilot programme in Fiji, exploring the potential for Extended Producer Responsibility to support circularity in flexible plastics in Pacific small island developing countries.

In April 2018, WRAP and the Ellen MacArthur Foundation launched their world-leading UK Plastics Pact, with support from the Department for Environment, Food & Rural Affairs (Defra) and more than 80 businesses, non-governmental organisations, Government organisations and service providers. The UK Government's funding of WRAP, who run the UK Plastics Pact (UKPP), has seen vast progression across industry. For example, members have increased the average recycled content in their packaging from 8.5% in 2018 to 24.1%. UKPP members cover the entire plastics value chain and are responsible for the majority of plastic packaging sold through UK supermarkets, and approximately two thirds of the total plastic packaging placed on the UK market.

The UK Plastics Pact is the first of its kind in the world and has expanded to 19 countries since its inception. The successes from this initiative are now being shared internationally, with WRAP supporting the development of the India Plastics Pact, demonstrating how this country is leading by example.

**3. Please provide any specific policies on regulation that your Excellency's Government has implemented to ensure that multinational corporations, such as Coca-Cola Europacific Partners Plc, adhere to environmental and human rights standards in their overseas operations.**

The UK supports voluntary due diligence approaches taken by UK businesses to respect human rights and the environment across their operations and supply relationships, in line with the UN Guiding Principles on Business and Human Rights (UNGPs) and the OECD Guidelines for Multinational Enterprises.

As an adherent to the 1976 OECD Declaration on International Investment and Multinational Enterprises, the UK is legally required to operate a [National Contact Point](#) (NCP) to promote the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct (the 'Guidelines') and provide a non-judicial grievance mechanism for complaints of non-observance by UK businesses.

In the UK, under the Companies Act 2006, all directors of a company are required to consider the impact of a company's operations on a range of factors including the community and environment when making decisions to promote the success of a company. Since 2019, large companies are required to disclose how they have done that in their Annual Report. In addition, certain other companies (quoted companies and large public interest entities) are required to report on social matters and respect for human rights as part of their annual reports and accounts.

The UK also has clear legislation to combat forced labour in supply chains. Section 54 of the Modern Slavery Act 2015 requires commercial businesses who operate in the UK and have a turnover of £36m or more to report annually on the steps they have taken to prevent modern slavery in their operations and supply chains.

We will assess and monitor the effectiveness of the UK's existing measures, alongside the impacts of new policy tools that are emerging, to ensure we can best promote responsible business practices and take action where appropriate.