



UK Mission
Geneva

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Note Verbal No. 229

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 6 2025, further to the letter dated 11 June 2025 from the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes; the Working Group on the issue of human rights and transnational corporations and other business enterprises; the Special Rapporteur on the human right to a clean, healthy and sustainable environment and the Special Rapporteur on the human rights to safe drinking water and sanitation.

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, 15 August 2025

Special Procedures Branch
Office of the High Commissioner for Human Rights



UK Mission
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United Kingdom of Great Britain and Northern Ireland

Response to Special Procedures communication AL GBR 06/2025 from the Working Group on the issue of human rights and transnational corporations and other business enterprises; Special Rapporteur on the implications for human rights for the environmentally sound management and disposal of hazardous substances and wastes; Special Rapporteur on the human right to a clean, healthy and sustainable environment and the Special Rapporteur on the human rights to safe drinking water and sanitation

Thank you for your letter dated 11 June 2025.

- 1. Please provide any additional information and/or comment(s) you may have on the above-mentioned allegations.**

The UK Government is committed to promoting responsible business. In particular, the UK has been a long-term adherent to the UN Guiding Principles on Business and Human Rights (“UNGPs”): it was the first country to publish its national action plan and it is currently carrying out a National Baseline Assessment (NBA) on the implementation of the UNGPs.

Dundee Precious Metals is not a UK-domiciled company. Weatherly International PLC went into administration in 2018 and is consequently no longer domiciled in the UK. We note that Weatherly International sold its interest in the Tsumeb Smelter before the UNGPs were endorsed by the UN Human Rights Council in 2011.

- 2. Please provide your views on the exemption of liabilities clauses in the context of change of owner of companies that have activities that impact the environment and human rights.**

The UK Government does not comment on ongoing cases.

- 3. Please provide any information on your interactions with company domiciled in your country in relation to their operations in Tsumeb and any assessment of the impact of their activities on human rights and the environment in Namibia?**

The allegations relate to a company that sold ownership of the Tsumeb smelter in 2010 to Dundee Precious Metals. Weatherly International PLC went into

administration in 2018 and is consequently no longer domiciled in the UK. As such, there is no record of any interaction between the UK Government and this entity on their operations in Tsumeb nor the impact of their activities on human rights and the environment in Namibia.

- 4. Please highlight the steps that your Excellency's Government has taken, or is considering taking, including policies, legislation, and regulations, to fulfil its obligations to protect the population against human rights abuses by business enterprises under its jurisdiction as set forth by the UN Guiding Principles on Business and Human Rights (UNGPs). In this context, please provide information on the steps taken to ensure that businesses conduct human rights due diligence to identify, prevent, mitigate and account for how they address their impacts on human rights throughout their activities, including requiring human rights due diligence. Please provide information on the means taken by your Excellency's Government to ensure that businesses provide for or cooperate in the remediation of adverse impacts they have caused or contributed to, in line with the corporate responsibility to respect human rights.**

The UK Government is committed to the implementation of the UNGPs, which are widely regarded as the authoritative international framework to steer practical action by Governments and businesses worldwide on this important agenda. The UK has a range of measures in place to promote human rights across the economy.

The UK Government supports voluntary due diligence approaches taken by UK businesses to identify and prevent human rights abuses and environmental harms across their operations and supply chains, in line with the UNGPs and the OECD Guidelines for Multinational Enterprises. The UK is legally required to operate a National Contact Point (NCP) to promote the OECD Guidelines and provide a non-judicial grievance mechanism for complaints of non-observance by UK businesses. As part of the Trade Strategy, the Department for Business and Trade established the Office for Responsible Business Conduct to replace the UK NCP. This strengthened office will better reflect the importance of its mission to this Government.

The UK Government also has clear legislation to combat forced labour in supply chains. Section 54 of the Modern Slavery Act 2015 requires 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. The Home Office has also recently updated the Transparency in Supply Chains statutory guidance. This guidance is more comprehensive, practical and ambitious.

In the UK, under the Companies Act 2006, all directors of a company are required to consider the impact of a company's operations, including on 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, 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.

In the UK Trade Strategy, the Department for Business and Trade launched a review into the UK's approach to responsible business conduct. The review will aim to understand the effectiveness of the UK's current regime and alternative means of supporting responsible business practices. The Foreign, Commonwealth and Development Office is also carrying out a National Baseline Assessment (NBA) on the implementation of the UNGPs. The NBA will contribute to the evidence base to inform the UK's approach to tackling business-related human rights abuses, including in global supply chains.

- 5. Please provide information on preventative measures your Excellency's Government has taken, or is considering taking, to mitigate smelting byproducts' impacts and contamination, domestically and abroad, by business enterprises domiciled in your State.**

The UK Government works through our bilateral and multilateral engagement to encourage responsible mining that adheres to strong environmental, social and governance (ESG) standards. Mining can provide significant economic benefits - creating employment, supporting growth, and reducing poverty. However, when carried out illegally, irresponsibly, or unsustainably, it can pose a severe threat to the environment, with negative implications for biodiversity, ecological systems, and human health.

The UK Government is committed to the sustainable development and use of natural resources both domestically and internationally. Mineral supply chains that follow ESG standards are more sustainable and resilient. We are ensuring that ESG principles are at the heart of our international approach to critical minerals and other commodities, embedding them in all that we do.

We promote ESG standards for resource extraction by encouraging transparent, rules-based land use decisions and supporting local capacity building to ensure environmental and social safeguards are upheld.

We are using our multilateral and bilateral agreements, and working in multilateral fora such as the G7 and G20, to promote responsible and high-quality mining standards globally.