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Geneva

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**Note Verbal No. 251**

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 10 2025, further to the letter dated 2 July 2025 from the Working Group on the issue of human rights and transnational corporations and other businesses enterprises; the Special Rapporteur on the promotion and protection of human rights in the context of climate change; the Special Rapporteur on the human right to a clean, healthy and sustainable environment; the Special Rapporteur on the right to food; the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health; the Working Group on the rights of peasants and other people working in rural areas and 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, 1 September 2025

Special Procedures Branch  
Office of the High Commissioner for Human Rights



UK Mission  
Geneva

**United Kingdom of Great Britain and Northern Ireland**

**Response to Special Procedure communications AL GBR 10/2025 of 2 July 2025 sent by the Working Group on the issue of human rights and transnational corporations and other business enterprises, the Special Rapporteur on the promotion and protection of human rights in the context of climate change, the Special Rapporteur on the human right to a clean, healthy and sustainable environment, the Special Rapporteur on the right to food, the Special Rapporteur on the right of everyone to the enjoyment of the highest attainable standard of physical and mental health, the Working Group on the rights of peasants and other people working in rural areas and the Special Rapporteur on the implications for human rights of the environmentally sound management and disposal of hazardous substances and wastes**

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The United Kingdom would like to thank you for your letter of 2 July. With regard to your specific questions, we would like to take each of these in turn.

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

The UK Government remains committed to promoting human rights across the world. We acknowledge the longstanding concerns raised by parliamentarians, civil society and affected communities regarding environmental damage and human rights impacts in the Niger Delta.

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. We continue to engage with Shell Plc, including at Ministerial level, to emphasise the need for high standards in both environmental stewardship and respect for human rights throughout their operations.

The Government of Nigeria has approved Shell Plc's sale of the Shell Petroleum Development Company of Nigeria Limited (SPDC) to Renaissance Africa Energy Company Limited. Whilst the UK continues to advocate for worldwide respect for human rights by States and businesses, the regulation of companies and activities within Nigeria remains a sovereign matter for the Government of Nigeria.

**2. Please provide information on measures that your Excellency's Government has taken or plans to take to identify and respond to the human rights impacts caused by the above-mentioned divestment process.**

The UK Government actively engages with civil society organisations, the Government of Nigeria and oil and gas companies to encourage a coordinated effort to address the human rights and environmental impacts of the oil and gas industry in Nigeria.

This includes work carried out under the Niger Delta Stability Programme, funded by the UK Government's Conflict, Stability and Security Fund (CSSF). The programme worked with civil society organisations to develop political economy analysis, which informed diplomatic and development strategies in the region. The UK Government has also encouraged the Hydrocarbon Pollution Remediation Project ("HYPREP") to meet the needs of the communities affected by pollution specifically in Ogoniland. As per Nigeria's nationally determined contributions (NDC) and National Action Plan on short-lived climate pollutants (SLCPs), Nigeria is committed to improving environmental conditions linked to the oil and gas sector, including by ending routine flaring and reduce methane emissions by 60% by 2030. This includes embedding expertise in key organisations and helping develop key policies and legislation such as the Climate Change Act 2021. Through programmes such as UK Partnerships for Accelerating the Climate Transition (UK PACT), Partnership for Agile Governance and Climate Engagement (PACE), and the NDC Partnership, the UK Government is helping Nigeria to achieve its climate and environment commitments by supporting improved climate policy and governance.

The UK Government's Facility for Oil Sector Transformation (FOSTER) supported Nigeria's efforts to improve the oil and gas sector's environmental impact and reduce gas flaring, enhancing governance institutions' capability for effective sector oversight and scrutiny, providing technical assistance to revise gas regulations under the Petroleum Act and improve Nigeria's capability to monitor CO<sub>2</sub> and methane emissions from the oil and gas sector, including from gas flaring and venting.

**3. Please provide information on concrete progress in requiring or encouraging companies domiciled in your territory and/or jurisdiction to implement human rights due diligence processes to identify, prevent, mitigate and account for how they address their impacts on human rights throughout their operations, including throughout the divestment processes described above, as set forth by the UN Guiding Principles on business and human rights (UNGPs).**

The UK Government is committed to the implementation of the UN Guiding Principles on Business and Human Rights (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 [UK 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.

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.

**4. Please provide information on the measures that your Excellency's Government plans to take to prevent the recurrence of ecological disasters at the hands of a company domiciled in its territory.**

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 an NCP to promote the OECD 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, 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. Since 2022, the largest listed and private companies are also required under the Companies Act to disclose their governance, strategy, risk management, metrics and targets for managing their material climate-related financial risks.

In June, the UK Government launched a consultation that seeks views on mandating UK-regulated financial institutions and large companies to develop and implement credible transition plans. If implemented, this requirement could help to support an orderly transition in line with global climate goals and enhance transparency, helping to ensure that climate impacts associated with the entity's operations are fully considered.

The UK Government has also provided diplomatic support and funding to enable the launch and ongoing work of the Taskforce on Nature-related Financial Disclosures

(TNFD). The international, science-based, market-led TNFD provides a nature risk management and disclosure framework to empower corporates and financial institutions to map, measure, manage and ultimately report on their investor-material nature impacts, dependencies, risks and opportunities, and align capital allocation in Net Zero- and Nature-Positive directions.

**5. Please provide information on the measures that your Excellency's Government is taking or considering taking to ensure that persons affected by activities occurring outside your territory by business enterprises domiciled in your jurisdiction have access to remedy in your country, through State judicial or extra-judicial mechanisms.**

The UK has a range of judicial and state-based non judicial mechanisms that help to support access to remedy for human rights abuses by business enterprises both in the UK and overseas.

Judicial remedies may be possible via a civil claim such as in tort [(for example, negligence)] or contract. If an overseas party wishes to file such a claim against a company domiciled in the UK, the jurisdiction rules in the relevant part of the UK will determine if a court will hear the claim. England & Wales, Scotland, and Northern Ireland each have their own rules, but generally those rules will allow a UK-domiciled company to be sued in the UK. There are also mechanisms by which a party who obtains a judgment abroad against a UK-domiciled company may be able to enforce it in the UK. The UK is a party to a number of bilateral and multilateral treaties which allow cross-border enforcement, and this is also possible under the common law (via a fresh claim).

The UK operates an [Office for Responsible Business Conduct](#), which has replaced the UK NCP, to promote the OECD Guidelines, provide practical support to businesses of all sizes and operate a non-judicial grievance mechanism to help resolve any complaints of violations of those Guidelines.