

Dzidek Kedzia
Chief, Research and Right to Development Branch
Office of the High Commissioner for Human Rights
United Nations, CH-1211 Geneva 10
Switzerland



10 November 2004

Dear Dzidek Kedzia,

The Prince of Wales International Business Leaders Forum (IBLF) is pleased to respond to the request of the Office of the High Commissioner for Human Rights for submissions on the subject of the Responsibilities of transnational corporations and related business enterprises with regard to human rights.

The IBLF works with national and multinational companies to promote responsible business practices and positive engagement in development. It does this through action to promote good practices and cross-sector partnerships with NGOs and public sector bodies, in particular in developing countries and emerging markets. IBLF does not speak on behalf of its members, represent member companies or endorse their products or practices. One of our key areas of focus for almost a decade has been business and human rights where we engage with companies and stakeholders to raise awareness of specific human rights challenges, corporate responsibilities and constructive responses.

With respect to the current undertaking of the Office of the UN High Commissioner for Human Rights to produce a report on the responsibilities of transnational corporations and related business enterprises with regard to human rights in advance of the UN Commission on Human Rights session in March-April 2005, the IBLF wishes to draw the attention of the OHCHR to the statement we issued on the eve of the 56th meeting of Commission on Human Rights in the context of its discussion on the *Norms on the responsibilities of transnational corporations and other business enterprises with regard to human rights* submitted by the UN Sub-Commission on the Promotion and Protection of Human Rights.

In this statement we made it clear that the IBLF believes that there is a need for an authoritative and comprehensive set of guidelines on the applicability of the Universal Declaration of Human Rights to companies that distils into one the numerous existing human rights related guidelines, including the UDHR, ILO Conventions and OECD Guidelines for Multinational Enterprises, to provide a common reference point for companies and bring much needed clarity to a difficult area, and reinforce initiatives such as the UN Global Compact which the IBLF has been supporting since its inception.

Whilst recognising that the UN Sub-Commission document has some room for clarification and improvement, and the general difficulty of interpreting development rights in a meaningful way in many contexts, the IBLF nevertheless sees the 'Norms' as providing companies with a useful framework of reference on which to build their own specific human rights policies, and an opportunity to demonstrate progress in commitment to human rights in their own legitimate spheres of influence as part of their overall commitment to responsible business.

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The IBLF acknowledges the efforts of the Working Group on the Working Methods and Activities of Transnational Corporations and hopes that the UN Commission on Human Rights establishes a process by which this first iteration at a framework of reference forms a key ingredient of further cross-sector consultation between business, governments and civil society on the appropriate role of the private sector with respect to human rights.

Yours sincerely,



Robert Davies
Chief Executive Officer
The Prince of Wales International Business Leaders Forum