



7 October 2006

Ms. Nicola Bonucci
Director of Legal Affairs
Organization for Economic Cooperation
and Development
2, rue Andre Pascal
75775 Paris
France

Dear Ms. Bonucci:

Thank you for your letter of 4 October 2006, in reference to our survey of the human rights policies and practices of the Fortune Global 500 firms.

I am responding to your exposition of the legal status of the OECD Guidelines, with which I am, of course, quite familiar. Moreover, I believe that use of the Guidelines through the OECD's National Contact Points system has enormous potential for the protection and promotion of human rights, so I pay close attention on that front as well.

For the purposes of the FG500 survey, we wanted to discover what if any instruments companies reference in their corporate human rights policies, and we wanted to be as inclusive as possible and not exclude any on the grounds that it either might not generally be regarded a human rights instrument as such, or did not enjoy the same legal status as the International Bill of Rights.

Accordingly, we noted the most frequently referenced instruments in the text. And the short footnote to which you refer had the sole purpose of acknowledging our awareness of the fact that instruments we were treating as falling within a single category, for the purposes of our discussion, were quite different when viewed from other perspectives. I apologize if my imprecise shorthand intended to explain this minor methodological point set off legal alarm bells at the OECD. In any event, I have removed the offending footnote from the report altogether.

Thank you for bringing this matter to my attention. As you request, I'll be happy to post both your letter and my response, and trust that you will do the same on your website.

With best wishes,

A handwritten signature in black ink, appearing to read "Ruggie". The signature is fluid and cursive, with the first letter being a large, stylized capital 'R'.

John G. Ruggie

*Kirkpatrick Professor of International Affairs
Director, Mossavar-Rahmani Center for Business & Government
Kennedy School of Government, Harvard University
Affiliated Faculty Member, Harvard Law School
Special Representative of UN Secretary General for Business and Human Rights*