



European Commission  
Commissioner for Trade  
Ms. Cecilia Malmström  
Rue de la Loi 170  
1000 Bruxelles

European Commission  
Vice-President of the European Commission and Commissioner for Better Regulation,  
Interinstitutional Relations, the Rule of Law and the Charter of Fundamental Rights  
Mr. Frans Timmermans  
Rue de la Loi 200  
1000 Bruxelles

17 March 2015

Dear Commissioner Malmström,  
Dear Vice-President Timmermans,

Please find in annex a joint open letter, signed by NGOs, NGO Networks, and academics requesting for a public consultation on the ongoing revision of the “Handbook for Trade Sustainability Impact Assessment” first adopted in 2006

With this letter we express our strong interest in more transparency and human rights accountability in EU trade policies. At the same we are highly committed to participate in and contribute to the process of the revision of the Handbook.

Yours sincerely,

Art.4.1(b)

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International Federation for Human Rights FIDH  
15, rue de la Linière, 1060 Bruxelles

Art.4.1(b)

Art.4.1(b)

German Catholic Bishops’  
Organisation for Development  
Cooperation  
MISEREOR  
Mozartstraße 9, 52064 Aachen

Dear Commissioner Malmström  
Dear Vice-President Timmermans

17 March 2015

**Open letter: Request for public consultation on the revision of the “Handbook for Trade Sustainability Impact Assessment” adopted in 2006**

The EU is currently revising the Handbook for Trade Sustainability Impact Assessment (SIA). We welcome this process since it is an important step to ensure that trade and investment agreements duly take into account the EU’s obligations and objectives as set down in its founding treaties, notably in terms of human rights and policy coherence for development.

However, we, as human rights organisations, development organisations, environmental organisations, international solidarity organisations, and academics are particularly concerned by the fact that the revision process could occur behind closed doors. This bears a great risk that analysis and recommendations on SIA and on Human Rights Impact Assessments (HRIA) on trade and investment policies developed in the last decade among civil society organizations and academics would not be given due attention in the new Handbook. As a result, we fear this revision process could be a missed opportunity to considerably strengthen the inclusion of human rights, in particular economic and social rights and the right to sustainable development, in the SIAs.

One of the failings of the SIA itself is precisely the way in which civil society consultations are held. Until now, these consultations have focused more on informing civil society about EU policies and studies than on initiating a genuine exchange of views sufficiently in advance of the decision and reports. We consider that a revision process of the Handbook, flawed by the same shortcomings, would be the worst signal that could be sent regarding the commitment of the EU to human rights, to sustainability and to ensuring the necessary improvements.

We, the undersigned 45 organisations, including networks representing over 2.500 member organisations, therefore call upon you to ensure the transparent and participatory character of the revision of the SIA Handbook and to organise a public consultation and an expert hearing to that end. These should take place early enough in the process to have a real impact on the outcome of the revision. Furthermore, we would appreciate receiving information about the consultation process launched with the European Parliament and the European Economic and Social Committee in that regard.

Yours sincerely,

The undersigned organisations

**fidh** **HRDN** **Beyond 2015** **CNGD** **11.11.11**  
Human Rights & Democracy Network Europe UN COMBAT DE PLEINS DROITS

**11.11.11** **MISEREOR** **OMCT**  
VECHT MEE TEGEN ONRECHT IHR HILFSWERK SOS-Torture Network

**CIDSE** **act:onaïd** **TERRE DES HOMMES**  
together for global justice FRANCE  
POUR LE DROIT À VIVRE DIGNES

**{ } PROTECTION** **pbi** **FIAN** **FORIM**  
international making space for peace

**DKA Austria** **Broederlijk Delen** **fdcl**  
Hilfswerk der Katholischen Jungschar OMDAT HET ZUIDEN PLANNEN HEET

**CHRISTIAN SOLIDARITY WORLDWIDE** **Confédération Paysanne** **Brot für die Welt** **Quaker Council for European Affairs** **AbL**  
VOICE FOR THE VOICELESS Brot für die Welt – Evangelischer Entwicklungsdienst Arbeitgemeinschaft bäuerliche Landwirtschaft e.V.

**fiacat** **Center of Concern** **International Partnership for Human Rights** **EUROPEAN ENVIRONMENTAL BUREAU** **Mundubat** **DEMAS**

**Oidhaco** **SOLIDARITÉ** **Réseau Foi & Justice** **kolko**  
Oficina Internacional de Derechos Humanos Acción Colombia Afrique Europe Antenne France Menschenrechte für Kolumbien e.V.

**JUSTICE & PEACE** **GRET** **Forum Umwelt und Entwicklung** **aitec**  
Local justice on a global scale Professionals for Fair Development Association Internationale de Techniciens, Experts et Chercheurs

**u<sup>b</sup>** **u<sup>b</sup>** **u<sup>b</sup>** **UNIVERSITÄT BERN** **IBFAN** **GREEN ADVOCATE**  
UNIVERSITÄT BERN DEFENDING BREASTFEEDING

**weed** **CFSI** **annd** **Taula Catalana per la Pau i els Drets Humans a Colòmbia**  
Centre for Development and Environment, Cooperation World Trade Institute, University of Bern, is signing.

\* Art.4.1(b) Centre for Development and Environment, Cooperation World Trade Institute, University of Bern, is signing.