

**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

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**11.11.11** **MISEREOR** **OMCT**  
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\* Dr. iur. Elisabeth Bürgi, Centre for Development and Environment, Cooperation World Trade Institute, University of Bern, is signing.