

CALL FOR PROPOSALS

Supporting the FTAO in developing "Shadow Guidelines" on Living Incomes and Due Diligence

1. Background

The Fair Trade Advocacy Office (FTAO) leads advocacy for the Fair Trade Movement at the EU level. It has the purpose of promoting justice, equity and sustainable development at the heart of trade structures and practices so that everyone, through their work, can maintain a decent and dignified livelihood and develop their full human potential. Formed as a joint initiative of Fairtrade International, the World Fair Trade Organization, and the World Fair Trade Organization-Europe, the FTAO leverages a broad coalition of civil society groups and social enterprises committed to equitable and sustainable trade.

The FTAO is conducting advocacy at the EU level to promote progress towards living incomes for workers and producers worldwide in agricultural and textiles supply chains. As part of its work, the FTAO seeks to ensure that policymakers are equipped with actionable, policy-aligned guidance that reflects current knowledge and can drive further progress.

In 2024, the EU, in its Corporate Sustainability Due Diligence Directive (CSDDD), enshrined the right to a living income and living wage in its Annex. While there is ample guidance on implementing living wages in due diligence processes, there is less technical material available on implementing living incomes of self-employed persons, such as smallholder farmers or home-based workers. The European Commission is legally mandated to create guidance on several aspects of implementing the CSDDD by July 2026. While the CSDDD was reopened in February 2025 and political negotiations are ongoing, the European Commission remains duty-bound as of this moment to create these guidelines.

2. Task of the project partner

The FTAO is seeking a project partner to support a **short-term project** in developing advocacy material for the promotion of effective implementation of living incomes.

The project partner will develop "shadow guidelines" for advocacy with the European Commission on implementing due diligence obligations with regard to living income, within the EU legal



framework. The project partner will develop an output modelled based on the format and language of the document that the Commission is expected to deliver (i.e. as a "shadow guidance document"). The FTAO previously followed this model to create a <u>Civil Society Shadow Textiles Strategy</u>, which was influential and impactful in shaping the EU's Textile Strategy; a similar approach will be used here. The expected outcome is the development of clear guidelines on how companies within the scope of the CSDDD should take steps towards implementing Living Incomes in their supply chains.

The project is being planned in close collaboration with the Living Income Community of Practice (LICOP), which is developing a separate technical guidance to support the implementation of Human Rights Due Diligence (HRDD) on Living Income, with a particular focus on the agri-food sector. The goal of this parallel project is to produce a practical, stakeholder-informed resource that helps companies and other actors carry out meaningful, risk-based due diligence aligned with international standards.

The primary audience of the FTAO project are EU policymakers, and the guidelines shall refer specifically to the context of the CSDDD. It is not part of this project to conduct primary research, such as interviews with companies, or to compile best practices. Living *wage* implementation is not a core focus (i.e. we do not expect the research to examine tripartite wage negotiations and related matters).

Specifically, the shadow guidelines are expected to address topics along the following lines:

- How to understand "adverse impact" in the context of living income
- Role of living income in each of the six steps of due diligence in the CSDDD, i.e. identification, as a prevention and mitigation measure, etc.
- How to determine "appropriateness" and "proportionality" of measures with regard to living income, i.e. minimum progress towards living income expected for CSDDD compliance
- Conceptual similarities in identifying Living Income and Living Wage, and differences in the development of appropriate and proportionate measures to address Living Income

3. Timeline

Overall, the project is expected to be completed within approximately 4 months:

Expression of interest until 19 August 2025, 9 am CEST (see below)

Response with an invitation to an online meeting by Fair Trade Advocacy Office to be received by **5 September 2025**

Contract to be set up and the project begin thereafter

Submission of project deliverable to the FTAO by 31 December 2025



4. Methodology and process

The project partner is expected to lead on the development of the shadow guidelines, via desk research and legal analysis. The project partner is expected to coordinate closely with the FTAO and its partners, and is expected to participate in alignment meetings with the Living Income Community of Practice and its project partner, in order to maximise synergies. This includes participation in regular online meetings, at least once a month. The project partner will be in direct contact with FTAO's senior policy and project coordinator to solve strategic questions or issues related to FTAO's views on any policy.

Upon completion of the project deliverable, online validation workshop(s) of the shadow guidelines are planned for January 2026. The project partner will be asked to participate but is not expected to organise this. If final revisions are required following the validation workshop, the project partner is expected to do so. The FTAO will be responsible for the final layout and design, and the deliverable will be released to the target audience in February 2026. The project partner may also be invited to participate in presenting the deliverable at a joint launch event with the Living Income Community of Practice.

5. Expressions of interest

All Expressions of Interest (EOI) should include a technical proposal (maximum 3 pages) highlighting:

- Brief profile of the project partner (organisation and people) and relevant previous experiences
- Proposed approach and methodology to the task, including level of effort (number of days), expected length of output

Additionally, the EOI shall include a separate financial proposal, which should provide cost estimates for services rendered, including professional fees and other costs (if any) to carry out the assignment. The available budget from the FTAO is approx. 14 500 EUR plus VAT.

To express interest, send the proposal via email to kahle@fairtrade-advocacy.org by 19 August, 9am CEST.

6. Selection criteria

The project partner will be selected based on an assessment of the following criteria (not sorted by importance):



- Demonstrated understanding of living income implementation and a deep understanding of existing materials on the topic;
- Demonstrated knowledge of EU law, notably the CSDDD;
- Demonstrated ability to conduct in-depth research and doctrinal legal analysis;
- Ability to explain the expected approach to the project given that relevant aspects of the CSDDD (such as company scope and whether to restrict due diligence to direct suppliers) are still undergoing political negotiations;
- Proposed cost and compatibility with the project's allocated budget;
- Alignment of the project partner with the FTAO's mission and core values of justice, equity and sustainable development.