

31 October 2025

Ms. Ursula von der Leyen, President of the European Commission
Mr. Magnus Brunner, Commissioner for Internal Affairs and Migration
European Commission
Rue de la Loi 200
1049 Brussels

Re: Special Envoy for the promotion of freedom of religion or belief outside the EU

Dear Madam President and Commissioner Brunner,

Amidst reports that the appointment of a new EU Special Envoy for the promotion of freedom of religion or belief (FoRB) outside the European Union appears to be imminent, including specific reporting about potential candidates,¹ we wish to raise some concerns about the positioning and transparency of the mandate, as well as make recommendations ahead of the appointment.

The right to FoRB is of fundamental importance. It forms the backbone of our work, as we seek to guarantee the rights of humanists, atheists, and the non-religious around the world,² and to support the right to FoRB for all, no matter their religion or belief.

However, the right to FoRB is 'intrinsically linked [...] to other fundamental freedoms and human rights', as the EU Guidelines on FoRB observe.³ The Vienna Declaration and Programme of Action (1993) states it clearly: 'All human rights are universal, indivisible and interdependent and interrelated. The international community must treat human rights globally in a fair and equal manner, on the same footing, and with the same emphasis'.

With this in mind, siloing the right to FoRB into a separate EU Special Envoy mandate, distinct from the EU Special Representative for Human Rights, risks undermining that very universality and interdependence that underpin human rights law. We have argued previously that this will discourage treating the right to FoRB in an inclusive and intersectional manner.⁴

Thus, a poorly chosen appointee is liable not to sufficiently balance the right to FoRB with other rights and could, inadvertently or intentionally, even instrumentalise it to undermine the human rights of others, including women, children, and LGBTIQ+ people. For instance, narratives of 'religious freedom' are frequently invoked to deny sexual and reproductive health and rights, including access to abortion. This is one reason why MEPs expressed their concerns in 2019 and 2020 about actions of an Envoy that could undermine the EU's credibility as a champion of human rights for all.⁵ The Parliament also called on the Commission to ensure that the appointee 'is dedicated to a human-rights based approach' and will respect sexual and reproductive health and rights.⁶ Similarly, the European Ombudsman expressed concern about the risk of instrumentalisation and called on the Envoy to take into account 'all human rights'.⁷

¹ <https://www.politico.eu/article/martin-selmayr-european-external-action-service-diplomacy/>

² The right to FoRB, as per the EU Guidelines on FoRB and General Comment no. 22 of the UN Human Rights Committee, extends to the non-religious and includes individuals holding nontheistic belief.

³ EU Guidelines on the promotion and protection of freedom of religion or belief, para. 25.

⁴ <https://humanists.international/2020/09/humanists-international-calls-for-focus-on-human-rights-and-transparency-in-eu-foRB-appointment/>

⁵ <https://web.archive.org/web/20221013151238/https://humanistfederation.eu/meps-to-j-c-juncker-is-eu-special-envoy-for-foRB-able-to-carry-out-his-mandate/>; <https://www.epfweb.org/sites/default/files/2020-09/EU%20Special%20Envoy%20on%20FoRB-%20Final%20version%20EC%20President.pdf>

⁶ EP resolution of 24 June 2021 (2020/2215(INI)), para. 59.

⁷ Decision in case 1553/2019/NH on the role of the EU's Special Envoy for the promotion of freedom of religion or belief outside of the EU.

Moreover, given the serious risks associated with the appointment of the Envoy, it is particularly disappointing that the Commission has not consulted the Parliament or civil society on candidate selection. It has also failed to share publicly candidate lists or selection criteria. The lack of transparency extends beyond the appointment: the mandate and work plan are not publicly available, and the Envoy does not publicly report their activities. Nonetheless, the Commission failed to heed Parliament recommendations that the Envoy produce annual reports on their work and priorities, as well as a comprehensive report at the end of the mandate.⁸

In light of these challenges, we encourage you to review the work of the Special Envoy to assess the added value of the position, in line with the Parliament's requests from 2019 and 2024.⁹ Specifically, we urge you to evaluate the need for a distinct position and consider repositioning the mandate under the auspices of the Special Representative for Human Rights to promote consistency and continuity in EU human rights policy and an institutionalised awareness of the relationship between the right to FoRB and other rights.

To ensure that the candidate will interpret the right to FoRB in an inclusive manner and as interdependent with other fundamental rights, the appointee should meet the following criteria:

- Possess demonstrable expertise in the international human rights law framework and show strong familiarity with the EU Guidelines on FoRB;
- Not have any public record or affiliations that conflict with the universality and interdependence of human rights, especially equal rights for LGBTIQ+ people and sexual and reproductive rights;
- Demonstrate a strong record of promoting freedom of religion or belief for all, including non-believers, in full coherence with other human rights and European values;
- Exhibit experience in engaging in inclusive, participatory dialogue with a wide spectrum of civil society actors and religious and belief communities, including non-believers.

To enhance the accountability, transparency, and effectiveness of the Envoy, we urge you to:

- Establish a transparent and accountable selection process, which should, at a minimum, include public lists of candidates and criteria as well as the meaningful consultation of Parliament and civil society;
- Avoid appointing a candidate to Special Envoy solely for political reasons;
- Place the Envoy position under the management of the Special Representative for Human Rights and integrate the Envoy into the EEAS structure;
- As mandated by the EU's commitment to gender mainstreaming, gender equality should be addressed in the Envoy's political and policy dialogues with partner countries;
- Establish a framework for transparency of the mandate, including public work plans and regular, detailed reporting on activities to Parliament and the public. Reports by the UN Special Rapporteur on FoRB on country missions provide a good model for this.¹⁰

Yours sincerely,



Gary McLelland
Chief Executive Officer
Humanists International¹¹

⁸ EP resolution of 15 January 2019 (2018/2155(INI)), paras. 14, 16.

⁹ EP resolution of 15 January 2019 (2018/2155(INI)); EP resolution of 28 February 2024 (2023/2118(INI)).

¹⁰ see <https://www.ohchr.org/en/special-procedures/sr-religion-or-belief/country-visits-and-reports>.

¹¹ EU Transparency Register no. 565204227036-69