

**European Committee of Social Rights  
Comité européen des Droits sociaux**



21 February 2005

**Collective Complaint No. 27/2004  
ERRC v. Italy**

**Case Document No. 4**

**OBSERVATIONS FROM THE  
EUROPEAN TRADE UNION CONFEDERATION  
(ETUC)  
ON THE MERITS**

**registered at the Secretariat on 16 February 2005**

The ETUC would hereby like to inform you that it in general aligns itself with the argumentation and conclusions taken by the ERRC in relation to the alleged violations by the Italian Government of Article 31 Revised European Social Charter, read alone or in conjunction with Article E of the Revised European Social Charter.

By way of general argumentation of its position, the ETUC would thereby like to refer to:

- \* Its (written) observations in relation to Complaint n° 15/2003 (ERRC vs. Greece)

- \* Its observations submitted at the Public Hearing in Strasbourg of 11 October 2004 regarding Complaint n° 15/2003 (ERRC vs. Greece)

- \* Its subsequent related interventions in the Governmental Committee (cfr. amongst others: 106th meeting - Greece - Article 16 RESC; 108th meeting - Romania - Article 16 RESC)

It should also be highlighted that, compared to the Collective Complaint n° 15, the arguments and facts submitted here by the ERRC against Italy underline even more the crucial link between on the one hand the regulation of legal status (citizenship and residence status) and on the other hand the access to social assistance, benefits and social housing AND the pivotal role of employment. As regards the latter, this was also clearly underlined in the ETUC observations submitted at the Public Hearing in Strasbourg of 11 October 2004 regarding Complaint n° 15/2003 (ERRC vs. Greece).

All this thus reinforces the fact that ETUC, as said, aligns itself in general with the argumentation and conclusions of ECCR in this collective complaint.

If the ECSR would decide to organize also in relation to this collective complaint a Public Hearing, the ETUC would of course be more than ready to submit further observations at that occasion.

Finally, the ETUC would like to sincerely apologise for the fact that it was for several reasons not able to submit its observations on time (i.e. by 15/02/2005) and in its traditional format. The ETUC, nevertheless, hopes that the ECSR would be willing to take the abovementioned observations into consideration.