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Sociale
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**EUROPEAN COMMITTEE OF SOCIAL RIGHTS
COMITÉ EUROPÉEN DES DROITS SOCIAUX**

15 February 2013

Case No. 9

Fellesforbundet for Sjøfolk (FFFS) v. Norway
Complaint No. 74/2011

**FURTHER ADDITIONAL OBSERVATIONS
OF THE GOVERNMENT
ON THE MERITS**

Registered at the Secretariat on 12 February 2013



ATTORNEY GENERAL - CIVIL AFFAIRS

The European Committee of Social Rights
Executive Secretary
Council of Europe
F-67075 Strasbourg Cedex
Frankrike

Our reference:
2011-0863 FPA

Date:
12.02.2013

COMPLAINT NO. 74/2011

FELLESFORBUNDET FOR SJØFOLK (FFFS) v. NORWAY

Inreference to the Government's submission of 23 January 2012 and the additional information promised therein, please find enclosed brief additional observations relating thereto.

A copy of this letter and the additional observations has also been transmitted by e-mail today to regis.brillat@coe.int , and to FFFS' attorney Mr Herlofsen.

Yours sincerely,
Attorney General – civil affairs

Fanny Platou Amble
Advocate

Enclosure



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ADDITIONAL COMMENTS ON THE MERITS

BY

THE KINGDOM OF NORWAY

COMPLAINT NO. 74/2011

FELLESFORBUNDET FOR SJØFOLK (FFFS) V. NORWAY

Reference is made to the Government's observations dated 23 January 2013, where it was given notice that the Government would like to forward information to the Committee on extent of employment on Norwegian vessels of seamen older than 62. Regretfully, it has taken somewhat longer than anticipated to obtain the data from the registers of the Norwegian Labour and Welfare Administration. However, as shown in **Appendix 1** hereto, the number is 319 as of 01.01.2011, and 430 as of 01.01.2013.

Yours sincerely,

Attorney General – civil affairs

Fanny Platou Amble
Advocate

Margit Tveiten
Deputy Director General
Ministry of Foreign Affairs
Adviser

01.01.2011

Appendix 1

DNK	8
ESP	1
EST	2
GBR	5
GRC	1
ISL	1
LVA	2
Nor	271
POL	14
PRT	2
RUS	2
Sun	1
SWE	9
Samlet	319

01.01.2013

DNK	11
ESP	1
GBR	11
GRC	1
ISL	2
LTU	1
LVA	3
Nor	347
NZL	2
PHL	3
POL	22
RUS	7
SUN	2
SWE	17

Samlet	430
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