



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

21 September 2020

Case Document No. 2

**European Federation of National Organisations Working with the Homeless
(FEANTSA) v. Czech Republic**
Complaint No. 191/2020

OBSERVATIONS BY THE GOVERNMENT ON ADMISSIBILITY

Registered at the Secretariat on 22 June 2020



VÍT ALEXANDER SCHORM
AGENT OF THE GOVERNMENT OF THE CZECH REPUBLIC
BEFORE THE EUROPEAN COURT OF HUMAN RIGHTS

Prague, 22 June 2020
Ref.: 3/2020-KVZ-OZ/4
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Collective complaint no. 192/2020
European Federation of National Organisations Working with the Homeless
(FEANTSA) v. the Czech Republic

Dear Mr Kristensen,

following your letter dated 6 March 2020, in which you informed the Government of the Czech Republic that the above mentioned collective complaint had been lodged with the European Committee of Social Rights, inviting them to submit observations on the admissibility of the collective complaint, I shall inform you that my Government leave the assessment of the admissibility of the collective complaint to the Committee's discretion.

Nevertheless, the Government are of the view that the particular complaint regarding the local residence permit requirements raised under Article 16 of the European Social Charter is not sufficiently substantiated by the applicant's organization as it does not clearly identify or demonstrate negative impacts of the said legislation on ensuring the rights stemming from Article 16 of the European Social Charter. The Government are, therefore, of the view, that this part of the complaint is inadmissible *ratione materiae*. However, since the assessment of this objection relates also to the substance of the complaint, such remarks will be raised in the submission on the merits of the case.

Yours sincerely,

Petr Konůpka
Deputy Agent of the Government

Mr Henrik KRISTENSEN
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