

The European Committee of Social Rights
Directorate general of Human Rights and Legal
Affairs
Council of Europe
F-67075 Strasbourg Cedex
FRANCE

Attn.: Régis Brillat

Our ref: 575470/102513

Your ref:

Oslo, 30 April 2012

Responsible partner: Erik Råd Herlofsen

COMPLAINT NO. 74/2011 – FELLESFORBUNDET FOR SJØFOLK (FFFS) (UNION OF SAILORS) VS NORWAY

Dear Mr Régis Brillat,

Reference is made to the additional comments on admissibility by the Kingdom of Norway dated 21 February 2012.

First of all, the Office of the Attorney General's description of the matter pending the Norwegian courts is incorrect. The matter is not about denial of tax-deductible expenses for members of labour unions that are not nationwide. FFFS is nationwide and the subject matter is only the question of why members of the FFFS should not be given the same tax deduction as members of the competing labour unions.

Secondly, the Office of the Attorney General's reference to a closed government meeting on 27 September 2011 is impossible for this party to verify. Such meetings are subject to professional secrecy and FFFS can not, in according to Norwegian law, call for minutes from the meeting, cf. Civil Procedure Act § 22-2.

The fact is that the government advised of the committee in a press release on 14 October 2011, whereby FFFS on 31 October 2011 asked to participate in the committee. State Secretary Rikke Lind replied the same day:

"Takk for det, tar det med oss. Viktig sak.

Rikke"

["Thanks for that, keeping it in mind. Important matter.

Rikke.""]

It then appears from the press release dated 18 November 2011 that the government the same day has appointed the committee.

Appendix 1: Copy of printout from the comment edition of the Civil Procedure Act § 22-2

Appendix 2: Copy of press release dated 14 October 2011

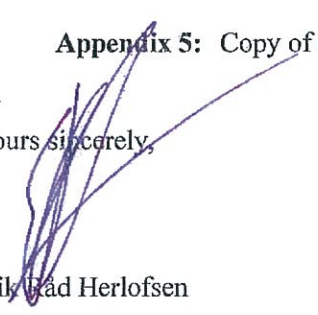
Appendix 3: Copy of e-mail correspondence with the ministry dated 31 October 2011

Appendix 4: Copy of press release dated 18 November 2011

Considering the fact that the Office of the Attorney General has questioned whether the General Manager is authorised to lodge a complaint to the European Social Charter, a copy of the minutes from the committee meeting of 25 April 2012, where it appears that the committee unanimously supports and approves the General Manager's lodging of the complaint, is enclosed.

Appendix 5: Copy of minutes of committee meeting dated 25 April 2012

Yours sincerely,



Erik Rød Herlofsen

Attorney/Partner