



Human Rights Council
Working Group on the Universal Periodic Review
Thirty-fourth session
4–15 November 2019

Summary of Stakeholders' submissions on Italy*

Report of the Office of the United Nations High Commissioner for Human Rights

I. Background

1. The present report was prepared pursuant to Human Rights Council resolutions 5/1 and 16/21, taking into consideration the periodicity of the universal periodic review. It is a summary of 34 stakeholders' submissions¹ to the universal periodic review, presented in a summarized manner owing to word-limit constraints.

II. Information provided by stakeholders

A. Scope of international obligations² and cooperation with international human rights mechanisms and bodies³

2. Joint Submission 7 (JS7) noted Italy had not yet ratified the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families, despite having received several recommendations in this regard.⁴ JS7 and Lawyers for Justice in Libya (LFJL) recommended that Italy ratify the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.⁵

3. Joint Submission 8 (JS8) noted that Italy was party to the United Nations 1954 Convention Relating to the Status of Stateless Persons (1954 Convention) and to the 1961 Convention on the Reduction of Statelessness, but the country was not party to the 1997 European Convention on Nationality.⁶ JS8 recommended that Italy accede to the 1997 European Convention on Nationality and the 2006 Convention on the Avoidance of Statelessness in Relation to State Succession.⁷

4. The International Campaign to Abolish Nuclear Weapons (ICAN) recommended that Italy take measures to remove all nuclear weapons from its territory, and sign and ratify the UN Treaty on the Prohibition of Nuclear Weapons.⁸

* The present document was not edited before being sent to United Nations translation services.



B. National human rights framework⁹

5. Volontariato Internazionale per lo Sviluppo (VIS) noted that Italy since 2007 had repeatedly expressed its will to establish an independent National Human Rights Institution (NHRI), but today it remained one of the two European States still lacking one.¹⁰

6. Joint Submission 3 (JS3) added that Italy had accepted 23 recommendations on the need to establish a NHRI.¹¹ Amnesty International (AI) and Joint Submission 6 (JS6) raised similar concerns.¹² Joint Submission 2 (JS2) noted that Italy had made two voluntary pledges in connection with its membership to the UN Human Rights Council (HRC), noting that in the candidature to the HRC entered by Italy for the third time, no pledge was even made regarding the establishment of a NHRI.¹³

7. JS3 recommended that Italy establish an independent national institution for the promotion and the protection of human rights coherent with the Paris Principles.¹⁴ VIS recommended that Italy implement its voluntary pledges and implement a transparent, participatory and inclusive process including civil society to establish a NHRI in line with the Paris Principles.¹⁵

C. Implementation of international human rights obligations, taking into account applicable international humanitarian law

1. Cross-cutting issues

Equality and non-discrimination¹⁶

8. AI noted that there had been no noticeable progress in the implementation of the many recommendations to combat all forms of discrimination.¹⁷ JS2 noted that the current anti-discrimination framework did not provide for effective means to address and discourage hate speech against Roma.¹⁸ Associazione 21 Luglio (ASSO21) recommended that Italy align the existing legal framework concerning incitement to discrimination and to racial hatred with the Committee on the Elimination of Racial Discrimination General Recommendation No. 35.¹⁹ CoE-CM recommended that Italy make sustained and effective efforts to prevent, combat and punish discrimination suffered by persons belonging to the Roma, Sinti and Caminanti communities, particularly women and girls.²⁰

9. CoE-ECRI noted positively the new Action Plan against racism, xenophobia and intolerance, which proposed measures to combat hate speech and racist, homophobic and transphobic violence, and that the creation of the Observatory for protection against discriminatory acts (OSCAD) was one practical measure to facilitate the reporting of hate crimes and communication between police and victims.²¹ Joint Submission 5 (JS5) recommended that Italy implement this action plan, including by allocating the necessary financial and human resources.²²

10. JS7 and AI noted that the action of the National Office against Racial Discrimination (UNAR) was considerably limited due to the lack of sanctioning powers to address episodes of anti-gypsyism.²³ The European Commission against Racism and Intolerance (CoE-ECRI) was concerned that the UNAR was not in compliance with the principle of independence of national bodies specialised in the fight against racism and intolerance.²⁴ The Committee of Ministers (CoE-CM) recommended that Italy review the mandate and status of the UNAR, with a view to strengthening its competencies, in accordance with the Paris Principles.²⁵

11. ASSO21 stated that anti-gypsyism remained one of the distinguishing features of Italian society, acting as a specific form of racism.²⁶ The European Roma Rights Centre (ERRC) observed that anti-Romani statements by public figures were increasingly common, including public insults, defamation and dissemination of ideas based on racial hatred and racial superiority.²⁷ A number of submissions referred to hate speech against Roma.²⁸ ERRC recommended that Italy publicly condemn and sanction all forms and instances of racist violence and the use of racist and xenophobic speech against members of

the Roma community, by public or private actors, and guarantee Roma physical security and protection from racist violence.²⁹

12. The European Union Agency for Fundamental Rights (EU-FRA) noted that the National Observatory on Hate Speech against Roma and Sinti had reported violent attacks against Roma in various Italian cities in 2016.³⁰

13. Joint Submission 1 (JS1) expressed that no anti-discrimination law tackling discrimination based on sexual orientation, gender identity and expression had been passed so far, with the exception of television, employment and military personnel.³¹ JS1 noted that in the last 12 months, hate speech against LGBTI persons had directly come from public officials and politicians.³² JS5 recommended that Italy promote an awareness-raising campaign and specific programmes to educate people about equal opportunities and respect for sexual orientation and gender identity.³³

*Development, the environment, and business and human rights*³⁴

14. JS7 welcomed that Italy had adopted a National Action Plan on Business and Human Rights 2016–2021.³⁵

Human rights and counter-terrorism

15. Access Now (AccessNow) noted that Italy had passed an anti-terrorism law, which extended the period during which internet service providers must keep users' metadata, from 12 months to 24 months, highlighting that this was passed in spite of the 2014 ruling by the European Court of Justice finding such data retention is a violation of human rights.³⁶

2. Civil and political rights

*Right to life, liberty and security of person*³⁷

16. Joint Submission 16 (JS16) noted that the surge in gun ownership was fuelled by an amplified climate of fear, insecurity and anti-immigrant sentiments, even though the crime rate in Italy had been falling for years.³⁸

17. JS16 highlighted that the recently adopted law widened even more the legal grounds for "self-defence", which could encourage more people to 'take justice in their own hands'.³⁹ JS16 recommended that Italy review and amend the legislation on self-defence to bring it in line with international human rights standards.⁴⁰

18. ERRC noted cases of violence against Roma including cases of violence by law enforcement officials, and violence perpetrated by private citizens.⁴¹

19. AI was concerned about the adequacy of the training and safeguards put in place to counter risks to health and safety and to avoid the misuse of projectile electric shock weapons used by police forces.⁴² AI and JS6 recommended that Italy ensure that members of the police can be effectively identified at all times when carrying out their functions.⁴³

20. In June 2017, the Commissioner for Human Rights of the Council of Europe (CoE-Commissioner) welcomed efforts to incorporate the crime of torture into the Italian Criminal Code, but urged the Chamber of Deputies to improve the Bill in order to make it fully compliant with international human rights standards, stressing that the definition of torture could create potential loopholes for impunity.⁴⁴ AI and JS6 noted Italy had enacted legislation against torture in 2017, but the definition of torture introduced was not consistent with the Convention against Torture.⁴⁵

21. AI welcomed the establishment of an independent National Preventive Mechanism as required by the Optional Protocol to the Convention against Torture.⁴⁶ JS6 noted that the first "National Guarantor for the rights of persons detained or deprived of personal liberty" (National Guarantor) was appointed in 2016, which coordinated a network of local Guarantors at regional and city levels. Regional Guarantors were present in 17 out of the 20 Italian regions.⁴⁷ JS6 recommended that Italy ensure the effective independence of the National Guarantor and provide the necessary funds for its functioning.⁴⁸

22. JS2 noted that the situation of overcrowding in prisons was presently a faded topic.⁴⁹ Joint Submission 4 (JS4) reported that from March 2016, there had been a worrying upward trend of penitentiary overcrowding due to the inadequacy of measures to stabilize the number of detainees. In November 2018, 60.002 detainees were "placed" in 45.983 spaces, with a national average of overcrowding rate of 130, 4%.⁵⁰ JS6 noted that, at the end of 2017, 34% of the prison population was made of detainees awaiting a final ruling.⁵¹

23. JS2 recognized alternative measures introduced by Law 103 of 2017, containing changes to the Penal Code, the Code of Criminal Procedure and the penitentiary system, which foresaw a simplification of procedures, alternative measures to detention, among other important innovations.⁵²

24. JS6 and JS7 were concerned about the number of suicides in prisons.⁵³ JS1 was concerned about the condition of LGBTI people, especially of Transgender detainees in prisons.⁵⁴

25. Associazione Comunità Papa Giovanni XXIII (APG23) recommended that Italy give effective and full implementation of law 62 of 2011, which provides that detained mothers, and their children find shelter in protected family homes.⁵⁵

26. Hands Off Cain (HOC) questioned the normative framework of life imprisonment, in particular, for cases where there was not possibility for real access to probation measures and alternative measures to detention.⁵⁶

*Administration of justice, including impunity, and the rule of law*⁵⁷

27. The Group of States against Corruption (CoE-GRECO) noted that the triennium 2016-2018 had witnessed a much awaited reform of the justice sector to substantially improve the efficiency of both civil and criminal trials, efforts for which the Italian authorities must clearly be commended. The reform had operated on different fronts regarding for example, appellate remedies, decriminalisation of minor offences and expedited procedures, alternative dispute mechanisms, organisation of courts, digitalisation of case management, etc.⁵⁸ JS2 noted that Italian judicial system efficiency had only improved slightly in the past years, length of proceedings remained a source of concern, especially at higher instances.⁵⁹

28. On 16 May 2017, CoE-Commissioner expressed concerns about a bill transferring juvenile justice competency from specialised to ordinary courts, which might dilute the capacity of judges and prosecutors to pay specific attention to children's needs, weakening the protection of the rights of children.⁶⁰

*Fundamental freedoms and the right to participate in public and political life*⁶¹

29. AccessNow and JS2 noted that defamation remained a criminal offence, leaving the press particularly vulnerable to suits because defamation committed by the medium of the press was an aggravated offense.⁶² The International Centre for Trade Union Rights (ICTUR) was concerned about the violent killings of at least two trade unionists, and for the absence of proper investigation of these cases.⁶³ JS2 noted that Italian journalists suffered frequent intimidations and that legal protection was weak and not strengthened. It added that the only improvement was in 2016, when Parliament decriminalized the crime of insult.⁶⁴

30. JS7 welcomed that Italy adopted a Freedom of Information Act (2016), allowing individuals to enforce their right to access information held by public authorities; however, the law still had several shortcomings, such as the lack of sanctions for public bodies that illegitimately refuse to disclose documents.⁶⁵

31. Several submissions noted to the new strict no-entry policy adopted by the Italian government, prohibiting NGOs involved in the sea rescue of refugees and migrants and Italian coast guards' vessels with migrants to disembark on Italian ports. The increasingly hostile treatment of NGOs dedicated to saving lives, situations of intimidation; hateful discourse; bureaucratic restrictions and court cases against them, was also noted.⁶⁶ AI recommended that Italy refrain from misusing criminal law and other punitive procedures against NGOs rescuing people in the Mediterranean, engage in responsible public

communication on life and death issues such as search and rescue at sea, and applaud the work of human rights defenders.⁶⁷

32. In January 2019, CoE-Commissioner expressed concerns about some recent measures hampering and criminalising the work of NGOs who play a crucial role in saving lives at sea, banning disembarkation in Italian ports, and relinquishing responsibility for search and rescue operations.⁶⁸

33. The Organization for Security and Co-operation in Europe-Office for Democratic Institutions and Human Rights (OSCE-ODIHR) noted that the campaign for parliamentary elections was conducted with respect for fundamental freedoms; however, it was confrontational and sometimes characterized by discriminatory stereotyping and intolerant rhetoric, targeting immigrants, including on social media.⁶⁹

*Prohibition of all forms of slavery*⁷⁰

34. Joint Submission 12 (JS12) noted that Italy was both a destination and a transit point for onward trafficking of victims from Eastern Europe and Africa.⁷¹

35. APG23 recommended that Italy implement the recommendations of the European Parliament Resolution of 26th February 2014 on sexual exploitation and prostitution, and on their consequences for gender equality, and adopt the so called “Nordic model”.⁷²

36. The Group of Experts on Action against Trafficking in Human Beings (CoE-GRETA) welcomed the considerable increase in budgetary funding allocated to anti-trafficking projects, the increase in the number of accommodation places for victims of trafficking, and the setting up of more reception centres for unaccompanied children.⁷³

37. CoE-GRETA noted positively that Italy had further developed the legal framework for combating trafficking of human beings and had adopted legislation strengthening the protection of unaccompanied children, including child victims of trafficking. Italy had also adopted the first National Action Plan against Trafficking in 2016.⁷⁴ JS7 welcomed that Italy had adopted legal measures to combat trafficking of persons in 2016; however, the adoption of such firm approach in legislation was not followed by sufficiently efficient law enforcement measures.⁷⁵

38. JS5 noted as positive the first biennial National Action Plan against trafficking in persons (2016).⁷⁶ Joint Submission 9 (JS9) stated that the lack of information regarding implementation made it extremely difficult to assess its effectiveness.⁷⁷ JS2 recommended that Italy create a national coordination structure to strengthen and direct Anti-Trafficking National Plan actions.⁷⁸

39. CoE-GRETA noted that a National Referral Mechanism for the identification and referral to assistance of victims of trafficking had been drafted as part of the National Action Plan, but remained to be implemented.⁷⁹

40. CoE-GRETA urged Italy to develop and maintain a comprehensive and coherent statistical system on trafficking in human beings.⁸⁰

41. CoE-GRETA welcomed the adoption of Guidelines for the identification of victims of trafficking among applicants for international protection.⁸¹

*Right to privacy and family life*⁸²

42. AccessNow noted that the legislation regulating government hacking activities (2017) was narrow and did not provide adequate safeguards for human rights. It reported that Italian law enforcement agencies conducted wiretapping of encrypted data by the so-called “Trojan inoculation” technique, but forensic analysis often inadvertently revealed that financial and personal data and other kind of information were found in sized encrypted data.⁸³

43. AccessNow noted that Italy must make stronger efforts to ensure that companies within its jurisdiction do not export surveillance technology to countries with a record of serious human rights violations.⁸⁴

44. JS1 noted that the Law on civil partnership and cohabitation (Law 76/2016) was approved. However, same-sex marriage had not been recognized yet and children of same-sex parents were still not fully recognized and protected.⁸⁵ JS7 recommended that Italy introduce legislation to allow same-sex couples to be fully recognized as families by extending to them full duties and rights of married couples, including the right to adoption.⁸⁶

3. Economic, social and cultural rights

Right to work and to just and favourable conditions of work⁸⁷

45. JS12 noted that despite a slight improvement, the economic crisis still had a serious impact on employment and access to the labour market in Italy.⁸⁸ It observed a concentration of women in part-time and low-paid jobs and the persistent gender wage gap in both the public and private sectors which adversely affected the career development of and pension benefits for women.⁸⁹

46. The Islamic Human Rights Commission (IHRC) noted the exploitation of migrant workers on farms, and reported that migrant labour was a booming business in Sicily, both for farmers and for the contractors, who recruited men and women to work illegally in the fields.⁹⁰

47. LFJL noted positively that Italy had adopted Law No. 199 of 29 October 2016 (the *Caporalato* law) which modified the law of 2011, introducing some positive changes such as broadening the crime or introducing the possibility of sanctioning the employer. It expressed concern that the law was still limited in protecting migrant workers.⁹¹

Right to an adequate standard of living⁹²

48. AI noted that progress in implementation of the National Strategy for the Inclusion of Roma, Sinti and Camminanti had been disappointing, leaving Romani people to face hardship and social exclusion.⁹³

49. ASSO21 noted that Italy had repeatedly failed to meet its international obligations because of the practice of officially constructing and managing the so-called “authorised camps”, specifically designed for Roma and Sinti, as an alternative to ordinary housing solutions. These camps presented hygienically deteriorated and insanitary conditions, and they frequently lacked adequate access to drinking water, sanitation facilities and adequate heating systems.⁹⁴ A number of submissions raised the same concern.⁹⁵ AI recommended that Italy review the social housing system and assignment procedures in all regions and municipalities and swiftly remove any provisions that directly or indirectly discriminate against Roma and other groups.⁹⁶

50. CoE-ECRI was concerned about the forced evictions of Roma from their unauthorised settlements, in some cases with no regard for procedural guarantees, such as the lack of notification in writing and the lack of re-housing solutions.⁹⁷ ERRC reported at least 318 forced evictions from April 2014, and it had found that families living in informal camps were persistently evicted without respect for the protections prescribed by international standards.⁹⁸ A number of submissions raised the concern of forced evictions from institutional and informal settlements.⁹⁹

Right to health¹⁰⁰

51. Joint Submission 10 (JS10) noted that the conditions of Italy’s mental health system were worrying.¹⁰¹

52. JS10 expressed that Italy should adopt a clear regulatory framework to allow fund research of cannabis inflorescences for therapeutic use.¹⁰²

53. JS12 noted that the worrying trend of addictions to alcohol, tobacco, drugs, and gambling among young people, which were dangerous for their health.¹⁰³ Joint Submission 15 (JS15) noted the potential health effects due to exposure to an electromagnetic field as a consequence of the operation of the Mobile User Objective System station in Niscemi.¹⁰⁴

54. JS10 expressed the necessity to reform the health system in order to respect the principle of equal access to treatment for persons with disabilities.¹⁰⁵ JS1 recommended that Italy provide training on LGBTI issues to health personnel and social workers to avoid any type of discrimination on the ground of sexual orientation and gender identity.¹⁰⁶

55. JS10 raised concerns about the regulation of assisted suicide and euthanasia.¹⁰⁷ ADF International (ADF) noted that Law No. 219/2017 allowed for a patient to make an advance refusal of life-prolonging medical treatments, noting that while this legislation did not formally regulate either euthanasia or assisted suicide, it achieved this result in practice.¹⁰⁸

*Right to education*¹⁰⁹

56. JS2 noted that the Italian education system had been characterized by a constant rise of non-Italian students during the last years. It added that although in early childhood education enrolment had increased, early drop outs remained a problem with a growing proportion of young Roma.¹¹⁰ ASSO21 recommended that Italy take all the necessary steps in order to ensure the implementation of concrete programs against scholastic drop-outs.¹¹¹

57. CoE-CM recommended that Italy provide adequate funding for teaching of and in national minority languages and ensure appropriate provision of qualified teachers and textbooks, paying special attention to the needs of persons belonging to the numerically smaller minorities.¹¹²

58. VIS noted the progress achieved with the drafting of a multi-year Action Plan to promote Global Citizenship Education, but indicated that the Action Plan had not yet been elaborated.¹¹³ JS3 was concerned about discrimination related to the right of the families of children to educational choice.¹¹⁴ JS12 observed with concern that human rights education was not yet part of school programs nor of teacher training.¹¹⁵

59. ASSO21 noted that forced evictions and housing segregating affected the schooling rates of Roma minors and overall their educational pathways.¹¹⁶ CoE-CM recommended that Italy ensure that all Roma, Sinti and Caminanti children, irrespective of their status, have full access to and are fully included in mainstream education.¹¹⁷

60. JS12 raised concerns about the formal education system of children with disabilities.¹¹⁸

61. EU-FRA noted that the Ministry of Education, Higher Education and Research had sent a circular to all seven-school authorities in Italy to mark the international day against homophobia, transphobia and biphobia.¹¹⁹ However, JS1 noted that few measures had been undertaken against homophobia in school and that transphobia was constantly neglected.¹²⁰

4. Rights of specific persons or groups

*Women*¹²¹

62. JS2 noted that violence continued to affect women severely in Italy and expressed concern for a lack and inadequacy of reception places for women fleeing violence.¹²²

63. JS7 noted that the Italian legal framework did not provide measures aimed at specifically and exclusively protecting women.¹²³ JS2 reported that it maintained a focus on punishment, rather than effective prevention and protection measures.¹²⁴

64. JS2 stated that the third strategic plan to counter violence against women (2017–2020) had increased allocations for policy implementation and mentioned harmful practices, such as female genital mutilation; however, it noted the lack of coherence and coordination in implementation.¹²⁵

65. JS16 noted that both, the National Action Plan on violence against women and the third National Action Plan for the implementation of the Security Council Resolution 1325/2000 (NAP1325) had not paid attention to the correlations between violence against women, and notably femicides, with the use of firearms. It was very concerned that the government had loosened the country's gun control regulations in 2018.¹²⁶ JS16 noted that although Italy's commitment to the Women, Peace and Security agenda was welcomed, the NAP1325 had several gaps.¹²⁷

66. La Manif Pour Tous (LMPT) expressed concerns about the use of surrogacy.¹²⁸ JS10 noted that Italy should adopt norms to meet the lack of regulation concerning surrogacy.¹²⁹

*Children*¹³⁰

67. JS5 expressed that children of foreign origin were still greatly discriminated against, even when born and brought up in Italy. Other children who were victims of discrimination include unaccompanied foreign minors, children belonging to ethnic, linguistic and religious minorities (such as the Roma, Sinti and Camminanti), children with imprisoned parents, children with disabilities, and children with a minority sexual orientation or gender identity.¹³¹

68. JS9 noted that the National Plan for the Prevention and Fight against Abuse and Sexual Exploitation of Children stipulated protecting children through support and psychotherapeutic recovery programmes for child victims of sexual crimes.¹³²

69. APG23 recommended that Italy restart the activities of the National Observatory for Children and Adolescence, clarifying its role and functions.¹³³

70. The Global Initiative to End All Corporal Punishment of Children (GIEACPC) noted that Italy considered that since corporal punishment in all settings was unlawful by virtue of the Supreme Court judgment, there was no need to prohibit it through law reform; however, there had been no law reform to confirm the judgment in legislation by amending article 571 or enacting explicit prohibition of corporal punishment at home.¹³⁴

71. JS9 noted the difficulty to gauge the true number of unaccompanied foreign minors within Italy. It reported that as of January 2019, 4,492 minors previously registered at reception centres were reported missing and were at risk of ending up in the hands of traffickers or criminal networks.¹³⁵ VIS noted positively that Italy had adopted an important law 47/2017, concerning protection measures of foreign unaccompanied minors.¹³⁶ JS6 noted that Law 47/2017 provided the absolute prohibition to refuse unaccompanied minors at the frontier.¹³⁷ A number of submissions raised the same subject.¹³⁸

72. JS9 noted that Italian legislation had been greatly innovative in order to comply with the Convention on Protection of Children against Sexual Exploitation and Sexual Abuse of the Council of Europe. One innovation was the inclusion in the Criminal Code of a comprehensive definition of child sexual abuse material.¹³⁹

73. JS9 noted the risk of sexual exploitation through digital technology. It recommended that Italy explicitly criminalise the live-streaming of child sexual abuse as well as knowingly obtaining access to child sexual abuse material through Internet and communications technologies.¹⁴⁰

*Persons with disabilities*¹⁴¹

74. JS2 noted that the legal protection framework for people with disabilities did not include the definition of multiple discrimination or the explicit recognition of reasonable accommodation among other problems.¹⁴² It recommended that Italy mainstream the rights of people with disabilities in all policies, especially in official data collection, with attention to women and girls in institutions and social and health structures.¹⁴³

75. Joint Submission 11 (JS11) stressed the importance of libraries in their work to deliver on the right of access to information for persons with disabilities through the provision of materials and services.¹⁴⁴

*Minorities and indigenous peoples*¹⁴⁵

76. ASSO21 noted that the crucial factor complicating the design and implementation of effective inclusive policies was the substantial lack of disaggregated data regarding the Roma and Sinti communities living in Italy.¹⁴⁶

77. CoE-CM recommended that Italy take urgent steps to elaborate and adopt a specific legislative framework, at national level, for the protection of the Roma, Sinti and Caminanti communities.¹⁴⁷ CoE-CM recommended that Italy consult representatives of the Roma, Sinti and Caminanti communities, including women, in all projects and activities

concerning them, in particular those implemented in the framework of the National Strategy for the Inclusion of Roma, Sinti and Caminanti Communities 2012–2020, at national, regional and local levels.¹⁴⁸

78. CoE-CM recommended that Italy make sustained efforts to promote the use of minority languages by persons belonging to minorities in dealings with the local administrative authorities; and ensure that linguistic help desks are opened in all the municipalities concerned and that these help desks are given the human and financial resources they need to operate effectively.¹⁴⁹

79. APG23 recommended that Italy implement the Framework Convention on National Minorities of the Council of Europe.¹⁵⁰

*Migrants, refugees and asylum seekers*¹⁵¹

80. IHRC noted that Italy had been at the forefront of migration flows into Europe for decades, and that previous governments, despite various criticisms, had historically been supportive of EU efforts to support asylum processes, providing safety and security for those reaching European shores. The last four years had seen both the cassation of EU rescue missions, but also a change in political climate in Italy that had resulted in overtly anti-migrant / anti-refugee and anti-minority discourse and policy.¹⁵²

81. Several submissions noted Italy had violated refugees and migrants' rights through the externalization of border control to countries outside Europe, through agreements on migration control with North African countries, which had led migrants and asylum-seekers to be denied access to international protection. Italy's strategy, backed by the European Council, had been to build the capacity of a third country authorities to stop irregular border crossings and to adopt "pushback by proxy", breaching the principle of *non-refoulement* by indirectly returning migrants to countries where they face well documented grave human rights violations.¹⁵³

82. CoE-Commissioner underscored the need to uphold the human rights of persons rescued at sea. Acknowledging Italy's role in the past in saving lives at sea and in receiving asylum seekers and migrants on arrival. The Commissioner urged the authorities to ensure that the human rights of persons rescued at sea are never put at risk because of current disagreements between member states about disembarkation.¹⁵⁴

83. Joint Submission 14 (JS14) noted that Italy had failed to recognize that rescue is a fundamental obligation of all the major international agreements on protecting life at sea.¹⁵⁵ IHRC noted that the rules regarding rescues at sea were spelled out in a number of international maritime law treaties and customary law principles.¹⁵⁶

84. A number of submissions stated that Law 132/2018 had modified asylum procedures, making it more difficult for people coming from countries deemed 'safe' to prove they need protection, increasing the risk of *refoulement*.¹⁵⁷

85. Several submissions referred to Law 132/2018 on international protection, immigration and public security, raising concerns on numerous grounds. Numerous submissions referred to the abolition of "humanitarian protection", which was a form of additional protection to the recognition of refugee status. After this measure, asylum seekers do not have a residence permit on humanitarian grounds, except in cases of specific special permits regulated by the new law. It would deprive thousands of people of a legal status, and to access health, housing, or education, and it could cause an increase in irregular immigrants.¹⁵⁸

86. Several submission noted that Law 132/2018 had limited access to the Protection System for Asylum Seekers and Refugees (SPRAR) now called SIPRIOMI to those who have already obtained international protection, unaccompanied foreign minors and those in possession of "special" residency permits. This reception system had aimed to facilitate the integration of asylum seekers into Italian society. Asylum seekers were not anymore entitled to be hosted in these reception centres and they are now allocated in the "centres for asylum seekers reception" (CARA), throughout the duration of their pending application. Holders of humanitarian protection are not to be included in this system either.¹⁵⁹

87. A number of submissions noted that Law 132/2018 had amended the length of detention for identification purposes in repatriation detention centres (CPR), hotspots, regional hubs, border police stations, which had been extended from 90 to a maximum of 180 days. It was noted that Italy's National Ombudsman for the rights of persons detained or deprived of personal liberty had repeatedly drawn attention to the conditions in which individuals live in immigration detention facilities.¹⁶⁰

88. Some submissions referred to the "hotspot approach" in accordance with European Union regulations and to reports of ill-treatment and excessive use of force by police to coerce refugees and migrants to give their fingerprints.¹⁶¹

89. Some submissions noted that Law 132/2018 had amended Italian legislation concerning citizenship by introducing new cases for withdrawing Italian citizenship acquired through naturalization - in the event of final sentence for serious crimes of terrorism or insurgency- and extending the time limit for the process of acquiring citizenship to 48 months.¹⁶²

90. A number of submissions noted that Italy had breached the principle of *non-refoulement* when carrying out expulsions of irregular migrants, without an adequate and individualized assessment by judicial authorities.¹⁶³

91. Joint Submission 13 (JS13) raised concerns about new proceedings for cases concerning the appeal of the decisions on international protection issued by the territorial commissions introduced by Law 46/2017.¹⁶⁴

Stateless persons

92. Joint Submission 8 (JS8) noted the national census did not provide the full picture of statelessness in Italy and questioned the Italian administrative and judicial systems for determining statelessness.¹⁶⁵ JS6 and JS8 were concerned about the situation of stateless persons, especially for Roma people.¹⁶⁶ APG23 raised the same concern for Roma children.¹⁶⁷

93. JS8 noted that some initiatives had been established to address the significant risk of statelessness among Roma populations, including a national strategy for the inclusion of Roma, Sinti and Camminanti communities for the period 2012–2020, but it was unclear what concrete action had been taken by the Government in this regard.¹⁶⁸

94. JS6 recommended that Italy review the domestic law on the status of statelessness to put it in line with the provisions of the 1961 Convention on the Reduction of Statelessness.¹⁶⁹

Notes

¹ The stakeholders listed below have contributed information for this summary; the full texts of all original submissions are available at: www.ohchr.org.

Civil society

Individual submissions:

AccessNow	AccessNow (United States of America);
ADF International	ADF International (Switzerland);
AI	Amnesty International (United Kingdom of Great Britain and Northern Ireland);
APG23	Association "Comunità Papa Giovanni XXIII" (Italy);
ASSO21	Associazione 21 Luglio (Italy);
ERRC	European Roma Rights Centre (Hungary);
EU FRA	European Union Agency for Fundamental Rights (Austria);
GIEACPC	Global Initiative to End All Corporal Punishment of Children (United Kingdom of Great Britain and Northern Ireland);
ITF	International Transport Workers' Federation United Kingdom of Great Britain and Northern Ireland);
HOC	Hands Off Cain (Italy);
ICAN	International Campaign to Abolish Nuclear Weapons (Switzerland);

ICTUR	International Centre for Trade Union Rights (United Kingdom of Great Britain and Northern Ireland);
IHRC	The Islamic Human Rights Commission (United Kingdom of Great Britain and Northern Ireland);
LFJL	Lawyers for Justice in Libya (United Kingdom of Great Britain and Northern Ireland);
LMPT	La Manif Pour Tous (France);
OSCE-ODIHR	Office for Democratic Institutions and Human Rights/Organisation for Security and Cooperation in Europe (Poland);
VIS	Voluntariato Internazionale per lo Sviluppo (Italy).
<i>Joint submissions:</i>	
JS1	Joint submission 1 submitted by: Arcigay-Associazione LGBTI italiana; Associazione Radicale Certi Diritti; LGBTI Resource Centre; OII Italia; Outsport (Italy);
JS2	Joint submission 2 submitted by: A.GE.; AGeDO; Agenzia della Pace; Agesci; Ananke; ANFAA; ANOLF; Antigone; Archivio Disarmo; Archivio Immigrazione; ARCI; Arcigay; Arte per i Diritti Umani Articolo 21; ASGI; Associazione Campanari d'Arrone; Associazione Eleonora Pimentel; Associazione Astro Nascente; Assopace; Associazione Senza Confini; ATD-Quarto Mondo; AUCI; AUSER; Banca Etica; Be Free; Casa dei Diritti Sociali; CGIL; Chiamalafrica; CIAI; CIPAX; Coordinamento di Initiative Popolari di Solidarietà Internazionale; CIR; CISL Dipartimento Politiche Migratorie; CISMAI; CISP; Comitato per i Diritti Umani; Comitato Singh Mohinder; Comitato UNRWA Italia; DPI Italia; Donne in Nero; EMA; Federazione Chiese Evangeliche; Federazione Italiana per il Superamento dell'Handicap; Fondazione Centro Astalli; Fondazione Internazionale Don Luigi di Liegro; Fondazione Basso-Sezione Internazionale; Fondazione Labos; FVGS; Giovani per un Mondo Unito; Gruppo Martin Buber; Guardavanti; ICS; IISMAS; IMS; INTERSOS; INTERVITA; IRMA; Istituto Cooperazione Economica Internazionale; Istituto di Medicina del Soccorso; Laboratorio Diritti Umani; La Gabbianella; Law-Legal Aid Worldwide; Legambiente; Lega Internazionale per i Diritti e la Liberazione dei Popoli; Libera; Med.ea; Medici Contro la Tortura; Medici per i Diritti Umani; Movimondo; Oltre Babele; Ossigeno per l'Informazione; Paxchristi; Ponte della Memoria; PRO.DO.C.S; Progetto Continenti; Rete Educare ai Diritti Umani; Save the Children Italia; Terre des Hommes; UBI Minor; UDI-Unione Donne in Italia; UIL; UNICEF Italia; Unione Forense per la Tutela dei Diritti Umani; UNITS; VIDES Internazionale; VIS; WILPF (Italy);
JS3	Joint submission 3 submitted by: Marist International Solidarity Foundation; Fondazione De La Salle Solidarietà Internazionale ONLUS; Fondazione Ambrosiana per la Cultura e l'Educazione Cattolica ; Associazione Maristi Onlus; Associazione Acuma Onlus (Italy);
JS4	Joint submission 4 submitted by: Nonviolent Radical Party; Transnational Transparency (Italy);
JS5	Joint submission 5 submitted by: A Roma Insieme Leda Colombini; ABA ONLUS Fondazione Ondazione Fabiola De Clercq Abio; Fondazione ABIO Italia; Onlus ACP; ACRA; Cooperazione Rurale in Africa e America Latina; AGBE; AGeDO; AGESCI; Ai; AIAF; AISMI; ALAMA; ALI per Giocare; Associazione Italiana dei Ludobus e delle Ludoteche; ALPIM; AMANI; Associazione di Volontariato; ANFAA; ANFFAS; Onlus Associazione Nazionale Famiglie di Persone con Disabilità Intellettiva e/o Relazionale; ANPE; ANPEF; Associazione APMAR ONLUS; Onlus Archivio

- Disarmo; Istituto di Ricerche Internazionali Arciragazzi
 Associazione 21 Luglio; Associazione Antonio Vita;
 Carrobiolo; L'Accoglienza ONLUS Bambinisenzasbarre
 Batya; CAM; CamMiNo; Nazionale Avvocati per la persona,
 le relazioni familiari e i minorenni; CARE; Coordinamento
 delle Associazioni familiari adottive e affidatarie in Rete;
 Caritas Italiana; CbM; Centro per la salute del bambino; Onlus
 Centro Studi e Ricerche; IDOS; Centro Studi Minori e Media
 Cesvi; CIAI; CISMAI; Cittadinanzattiva; CNCA; Comitato
 Giù le Mani dai Bambini; Onlus Comitato Italiano per
 l'UNICEF; Onlus Cooperativa Cecilia; Onlus Cooperazione
 nei Territori del Mondo CTM; Coordinamento Genitori
 Democratici; Onlus Coordinamento La Gabbianella Onlus;
 CSI; Centro Sportivo Italiano Dedalus; Cooperativa Sociale
 Cooperativa Sociale E.D.I.; Onlus – Educazione ai Diritti
 dell'Infanzia e dell'Adolescenza; ECPAT Italia; Associazione
 Figli Sottratti; FederASMA e ALLERGIE; Onlus Federazione
 Italiana Pazienti; FISH; Onlus FDV; Fondazione Roberto
 Franceschi; Onlus Giovanna d'Arco; Onlus Associazione
 GRD Bologna; ONLUS G2; Associazione Onlus Gruppo
 Nazionale Nidi e Infanzia; HelPeople Foundation; ONLUS
 IBFAN Italia; Associazione International Adoption; IPDM;
 IRFMN; L'abilità; Associazione Onlus L'Albero della Vita
 Onlus; L'altro diritto La Gabianella e altri animali; La Leche
 League Italia; Onlus M.A.I.S; MAMI Italiano; Onlus OVCI la
 Nostra Famiglia On the Road Associazione; Onlus Opera
 Nomadi Milano; Onlus Osservazion; Onlus Centro di ricerca
 azione contro la discriminazione di rom e sinti; Associazione
 Progetto Famiglia Onlus Paideial; Onlus Pollicino e Centro
 Crisi Genitori; Onlus Save the Children Italia; Onlus Saveria
 Antiochia Osservatorio antimafiaL Associazione; Onlus
 SIMM; SINPIA; SIP ; Società Sportiva Dilettantistica
 Crescere Educare Agire SOS Villaggi dei Bambini Onlus;
 Terre des Hommes Italia; Onlus UISP; UNCM; Associazione
 di promozione sociale; VIS; WeWorld; Fondazione "E.
 Zancan" Onlus (Italia);
- JS6 **Joint submission 6 submitted by:** Fédération Internationale
 de l'Action des Chrétiens pour l'Abolition de la Torture;
 ACAT Italy (France);
- JS7 **Joint submission 7 submitted by:** Coalizione Italiana Libertà
 e Diritti Civili; A Buon Diritto; Associazione Antigone;
 Associazione 21 luglio; Associazione per gli Studi Giuridici
 sull'Immigrazione; Cittadinanzattiva; Consiglio Italiano per i
 Rifugiati; Diritto di Sapere, Naga, Rete Lenford; Refugee
 Rights Europe (Italy);
- JS8 **Joint submission 8 submitted by:** Consiglio Italiano per i
 Rifugiati; Institute on Statelessness and Inclusion; and
 European Network on Statelessness (The Netherlands);
- JS9 **Joint submission 9 submitted by:** ECPAT Italia; ECPAT
 International (Thailand);
- JS10 **Joint submission 10 submitted by:** Associazione Luca
 Coscioni; Science for Democracy (Belgium);
- JS11 **Joint submission 11 submitted by:** International Federation
 of Library Associations and Institutions; Associazione Italiana
 Biblioteche (The Netherlands);
- JS12 **Joint submission 12 submitted by:** Istituto Internazionale
 Maria Ausiliatrice; VIDES International; International
 Volunteerism Organization for Women, Education, and
 Development; Caritas Internationalis; Caritas Italiana
 (Switzerland);

JS13	Joint submission 13 submitted by: International Federation for Human Rights; Unione forense per la tutela dei diritti umani (France);
JS14	Joint submission 14 submitted by: Oxfam Italia; Borderline Sicilia (Italy);
JS15	Joint submission 15 submitted by: International Fellowship of Reconciliation (Switzerland);
JS16	Joint submission 16 submitted by: Women's International League for Peace and Freedom; Fondazione Pangea onlus; Associazione Trama di Terre onlus; Filomena – La rete delle donne; Unione Donne in Italia (Switzerland).

Regional intergovernmental organization(s):

CoE	The Council of Europe, Strasbourg (France); Attachments: (CoE-Commissioner) Report by Mr. Nils Muižnieks, Commissioner for Human Rights of the Council of Europe, Strasbourg, CommDH; (CoE-ECRI) European Commission against Racism and Intolerance report on Italy, adopted on 18 March 2016, published on 7 June 2016; (CoE-GRETA)-Group of Experts on Action against Trafficking in Human Beings, Report concerning the implementation of the Council of Europe Convention pm Action against Trafficking in Human Beings by Italy, adopted on 7 December 2018; (CoE-GRECO) Compliance report on Italy, Fourth Round Evaluation, Corruption prevention in respect of members of parliament, judges and prosecutors, adopted by the Group of States against Corruption on 7 December, 2018, GrecoRC4(2018)13; (CoE-CM) Committee of Ministers, Resolution CM/ResCMN (2017) on the implementation of the Framework Convention for the Protection of National Minorities by Italy, adopted on 5 July 2017.
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² The following abbreviations are used in UPR documents:

ICERD	International Convention on the Elimination of All Forms of Racial Discrimination;
ICESCR	International Covenant on Economic, Social and Cultural Rights;
OP-ICESCR	Optional Protocol to ICESCR;
ICCPR	International Covenant on Civil and Political Rights;
ICCPR-OP 1	Optional Protocol to ICCPR;
ICCPR-OP 2	Second Optional Protocol to ICCPR, aiming at the abolition of the death penalty;
CEDAW	Convention on the Elimination of All Forms of Discrimination against Women;
OP-CEDAW	Optional Protocol to CEDAW;
CAT	Convention against Torture and Other Cruel, Inhuman or Degrading Treatment or Punishment;
OP-CAT	Optional Protocol to CAT;
CRC	Convention on the Rights of the Child;
OP-CRC-AC	Optional Protocol to CRC on the involvement of children in armed conflict;
OP-CRC-SC	Optional Protocol to CRC on the sale of children, child prostitution and child pornography;
OP-CRC-IC	Optional Protocol to CRC on a communications procedure;
ICRMW	International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families;
CRPD	Convention on the Rights of Persons with Disabilities;
OP-CRPD	Optional Protocol to CRPD;
ICPPED	International Convention for the Protection of All Persons from Enforced Disappearance.

- 3 For relevant recommendations see A/HRC/28/4, paras. 145.1–145.23; 145.55.
- 4 JS7, p.8.
- 5 JS7, p.8, LFJL, p.6.
- 6 JS8, p.2.
- 7 JS8, p.10.
- 8 ICAN, p.1.
- 9 For relevant recommendations see A/HRC/28/4, paras. 145.26–145.51; 145.53.
- 10 VIS, p.6.
- 11 JS3, p.2.
- 12 AI, p.1 and JS6, p.14.
- 13 JS2, p.6.
- 14 JS3, p.4.
- 15 VIS, p.7.
- 16 For relevant recommendations see A/HRC/28/4, paras. 145.61–145.96.
- 17 AI, p.1. See also: CoE-ECRI, pp.9-39.
- 18 JS2, p.9.
- 19 ASSO21, p.12.
- 20 CoE-CM, Resolution CM/ResCMN (2017), p.1.
- 21 CoE-ECRI, p.9.
- 22 JS5, p.3.
- 23 JS7, p.10 and AI, p.1.
- 24 CoE-ECRI, paras. 24 and 29. See also pp.9-39.
- 25 CoE-CM, Resolution CM/ResCMN (2017), p.1.
- 26 ASSO21, p.10.
- 27 ERRC, p.7. See also: EU-FRA, p.10.
- 28 JS2, p.9; JS7, p.10; EU-FRA, p.4; ERRC, p.7; ASSO21, p.10.
- 29 ERRC, p.9.
- 30 EU-FRA, p.10.
- 31 JS1, p.1.
- 32 JS1, p.3.
- 33 JS5, p.3.
- 34 For relevant recommendations see A/HRC/28/4, para. 145.183–145.186.
- 35 JS7, p.8.
- 36 AccessNow, p.2.
- 37 For relevant recommendations see A/HRC/28/4, paras. 145.24; 145.99–145.106.
- 38 JS16, p.4.
- 39 JS16, p.5.
- 40 JS16, p.6.
- 41 ERRC, p.6.
- 42 AI, p.3.
- 43 AI, p.8 and JS6, p.9
- 44 CoE-Commissioner, pp.1-2.
- 45 AI, p.1 and JS6, pp.5-6.
- 46 AI, p.1.
- 47 JS6, p.3.
- 48 JS6, p.4.
- 49 JS2, p.6.
- 50 JS4, p.2-4.
- 51 JS6, p.2.
- 52 JS2, p.6.
- 53 JS6, p.4 and JS7, p.11.
- 54 JS1, p.4.
- 55 APG23, p.2.
- 56 HOC, pp.2-5.
- 57 For relevant recommendations see A/HRC/28/4, paras. 145.129–145.131.
- 58 CoE-GRECO Compliance report on Italy, Fourth Round Evaluation, Corruption prevention in respect of members of parliament, judges and prosecutors, adopted by the Group of States against Corruption on 7 December, 2018, GrecoRC4(2018)13.
- 59 JS2, p.6.
- 60 CoE-Commissioner, p.3.
- 61 For relevant recommendations see A/HRC/28/4, paras. 145.133–145.135.
- 62 AccessNow, p.2 and JS2, p.8.

- ⁶³ ICTUR, pp.1-6.
- ⁶⁴ JS2, p.8.
- ⁶⁵ JS7, p.15.
- ⁶⁶ CoE-Commissioner, p.5; AI, p.7-9; ITF, p.2; IHRC, p.4; JS2, p.12; JS13, pp.11-14; JS14, p.4; JS16, p.16.
- ⁶⁷ AI, p.9.
- ⁶⁸ CoE-Commissioner, p.5.
- ⁶⁹ OSCE-ODIHR, p.2.
- ⁷⁰ For relevant recommendations see A/HRC/28/4, paras. 145.119–145.125.
- ⁷¹ JS12, p.2. See also JS9, p.3.
- ⁷² APG23, p.2.
- ⁷³ CoE- GRETA, para 294.
- ⁷⁴ CoE- GRETA, para 289.
- ⁷⁵ JS7, p.8.
- ⁷⁶ JS5, p.6.
- ⁷⁷ JS9, p.8.
- ⁷⁸ JS2, p.12.
- ⁷⁹ CoE- GRETA, para 293.
- ⁸⁰ CoE- GRETA, p. 69.
- ⁸¹ CoE- GRETA, para 293.
- ⁸² For relevant recommendations see A/HRC/28/4, paras. 145.97–145.98; 145.132.
- ⁸³ AccessNow, p.2. See also: EU-FRA, p.12.
- ⁸⁴ AccessNow, p.5. See also JS7, p.16.
- ⁸⁵ JS1, p.3. See also EU-FRA, p.8 and JS7, p.14.
- ⁸⁶ JS7, p.15.
- ⁸⁷ For relevant recommendations see A/HRC/28/4, para. 145.60; 145.136–145.139.
- ⁸⁸ JS12, p.8.
- ⁸⁹ JS12, p.10.
- ⁹⁰ IHRC, p.3.
- ⁹¹ LFJL, p.4.
- ⁹² For relevant recommendation see A/HRC/28/4, paras. 145.140.
- ⁹³ AI, p.1.
- ⁹⁴ ASSO21, pp.5-6.
- ⁹⁵ AI, p.7-9; JS2, p.9; JS5, p.8; JS7, pp.9-10. See also: EU-FRA, p.4.
- ⁹⁶ AI, p.9.
- ⁹⁷ CoE-ECRI, paras, 93, 94 and 95. See also p.9.
- ⁹⁸ ERRC, p.5.
- ⁹⁹ AI, p.7-9; ASSO21 (p.7); ERRC, p.5; JS2, p.9; JS5, p.8; JS7, pp.9-10. See also: EU-FRA, p.4.
- ¹⁰⁰ For relevant recommendation see A/HRC/28/4, paras. 145.151.
- ¹⁰¹ JS10, p.7.
- ¹⁰² JS10, p.8.
- ¹⁰³ JS12, p.8.
- ¹⁰⁴ JS15, pp.1-2.
- ¹⁰⁵ JS10, p.7.
- ¹⁰⁶ JS1, p.5.
- ¹⁰⁷ JS10, p.5.
- ¹⁰⁸ ADF, pp.1-2.
- ¹⁰⁹ For relevant recommendations see A/HRC/28/4, paras. 145.52; 145.152–145.156.
- ¹¹⁰ JS2, p.7. See also JS5, p.9.
- ¹¹¹ ASSO21, p.12.
- ¹¹² CoE-CM, Resolution CM/ResCMN (2017), p.2.
- ¹¹³ VIS, p.5.
- ¹¹⁴ JS3, p.10.
- ¹¹⁵ JS12, p.6.
- ¹¹⁶ ASSO21, p.7.
- ¹¹⁷ CoE-CM, Resolution CM/ResCMN (2017), p.1. See also: EU-FRA, p.12.
- ¹¹⁸ JS12, p.12.
- ¹¹⁹ EU-FRA, p.4.
- ¹²⁰ JS1, p.3.
- ¹²¹ For relevant recommendations see A/HRC/28/4, paras. 145.56-145.59; 145.107–145.118.
- ¹²² JS2, p.4.
- ¹²³ JS7, p.13.

- 124 JS2, p.4.
125 JS2, p.4.
126 JS16, p.3.
127 JS16, p.6.
128 LMPT, pp.2-6.
129 JS10, p.3.
130 For relevant recommendations see A/HRC/28/4, paras. 145.25; 145.54; 145.126–145.128.
131 JS5, pp.2-3.
132 JS9, p.13.
133 APG23, p.2.
134 GIEACPC, p.2. See also: JS5, p.8.
135 JS9, p.3.
136 VIS, p.5.
137 JS6, p.12.
138 JS2, p.7; JS3, pp.5-7; JS5, pp.11-12.
139 JS9, p.5.
140 JS9, p.3 and p.9.
141 For relevant recommendations see A/HRC/28/4, paras. 145.141–145.143.
142 JS2, p.10.
143 JS2, p.10.
144 JS11, p.4.
145 For relevant recommendations see A/HRC/28/4, paras. 145.144–145.151; 145.157–145.158.
146 ASSO21, p.2.
147 CoE-CM, Resolution CM/ResCMN (2017), p.1.
148 CoE-CM, Resolution CM/ResCMN (2017), p.2.
149 CoE-CM, Resolution CM/ResCMN (2017), p.2.
150 APG23, p.6.
151 For relevant recommendations see A/HRC/28/4, para. 145.159–145.182.
152 IHRC, p.1.
153 CoE-Commissioner, p.5; EU-FRA, pp.4-5; AI, pp.3-6; IHRC, pp.1-2; LFJL, pp.1-3; JS6, p.12; JS7, p.3; JS13, pp.1-4; JS14, pp. 1-4; JS15, p.4; JS16, p.12.
154 CoE-Commissioner, p.5. See also IHRC, p.1.
155 JS14, pp.1-4.
156 IHRC, p.4.
157 AI, pp.3-6; JS6, p.10; JS13, p.8.
158 CoE-Commissioner, p.5; AI, pp.3-6; APG23, p.5; IHRC, pp.2-5; LFJL, p.1; JS2, p.11; JS3, p.3; JS5, p.12; JS6, p.9; JS7, pp.2-3; JS12, p.3; JS13, pp.5-6; JS16, pp.12-13.
159 CoE-Commissioner, p.5; AI, pp.3-6; IHRC, pp.2-5; JS1, p.1; JS2, p.11; JS3, p.7; JS6, p.10; JS7, p.5; JS11, p.5; JS12, pp.3-4; JS13, pp.6-8; JS16, p.13.
160 AI, pp.3-6; JS2, p.11; JS6, p.10; JS7, p.6; JS13, p.7.
161 AI, pp.3-6; JS7, p.3.
162 JS7, p.9; JS8, p.8; JS12, p.5; JS13, pp.8-9.
163 AI, pp.3-6; ITF, p.1; LFJL, p.1; JS6, p.11; JS7, p.3; JS13, p.6; JS15, pp.3-4.
164 JS13, p.1.
165 JS8, pp.4-5.
166 JS6, and JS8, p.8.
167 APG23, p.4.
168 JS8, p.8.
169 JS6, p.14.
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