



The right to strike in the public sector

Estonia

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This factsheet reflects the situation in June 2019. , It was elaborated by Natalja Mickeviča (independent expert), updated by Stefan Clauwaert (ETUC/ETUI) and reviewed by EPSU/ETUI and sent to EPSU's Estonian affiliates for comment.

1. Legal basis

International level (relevant to the right to strike)

UN instruments

Estonia has ratified:

International Covenant on Economic, Social and Cultural Rights

(ICESCR, Article 8)

International Covenant on Civil and Political Rights

(ICCPR, Article 22)

ILO instruments¹

Estonia has ratified:

Convention No. 87 concerning Freedom of Association and Protection of the Right to Organise

(ratification on 22 March 1994);

Convention No. 98 concerning the Right to Organise and to Bargain Collectively

(ratification on 22 March 1994);

Estonia has not ratified

Convention No. 151 concerning Labour Relations (Public Service)

Convention No. 154 concerning the Promotion of Collective Bargaining.

European level

Estonia has ratified:

Article 6(4) (the right to collective action) of the Revised European Social Charter (ESC)

with no reservations

(ratification on 11 September 2000)

European Convention on Human Rights

(ratification on 16 April 1996), including Article 11.

Estonia has not yet accepted the Additional Protocol to the European Social Charter Providing for a System of Collective Complaints.

National level

The Constitution of the Republic of Estonia

Article 29 of the Constitution of the Republic of Estonia² provides that everyone is free to belong to unions and federations of employees and employers. The conditions and procedure for the exercise of the right to strike are provided by law.

Applicable laws

- The main legislative act regulating the right to strike in Estonia is the **Collective Labour Dispute Resolution Act** (CLDRA).³ It determines the procedure for resolving collective labour disputes and calling and organising strikes and lockouts.
- The **Trade Unions Act**⁴ provides for the right of trade unions to organise strikes.
- The **Civil Service Act**,⁵ as the main source of regulation in the public sector, prohibits civil servants from striking.
- The **Emergency Act**⁶ provides a list of essential services where a minimum level of services must be ensured during a strike.

2. Who has the right to call a strike?

According to Article 13 of the CLDRA, the right to organise a strike belongs to employees or associations or federations of employees. Employees can be represented either by a trade union or by employees' trustees.

Article 18 of the Trade Unions Act provides that, in order to achieve their objectives, trade unions have the right to organise general meetings, political meetings, street parades, pickets and strikes pursuant to the procedure prescribed by law. The election, obligations and rights of employees' trustees are specified in the Employees' Trustee Act.⁷

3. Definition of strike

Definition of a strike

The CLDRA defines a strike as an interruption of work on the initiative of employees or an association or a federation of employees in order to achieve concessions from an employer or an association or a federation of employers to lawful demands in labour matters (Article 2 of the CLDRA).

The following types of strike are provided for in the CLDRA:

- **regular strike**;
- **warning strike** lasting no longer than one hour (and with a notification of at least 5 days in advance);
- **sympathy (solidarity) strike** lasting no longer than three days in support of employees engaging in a strike and with a mandatory three days notice period.

According to Estonian case law, the purpose of the sympathy strike is to show solidarity to striking workers and to bring greater impact to the striking workers' cause. This implies, for example, that sympathy strikes can also be organised at a time when employees participating in a sympathy strike are obliged to work with their employer. The CLDRA does not prohibit the organisation of a sympathy strike to support workers in one or more other sectors.

The Supreme Court has also highlighted that, in a situation where workers stage a solidarity strike in sympathy with striking workers at other establishments and it turns out that one of the main strikes is illegal, the sympathy strike can still be legal, since the CLDRA does not provide otherwise.

The Court has established that the CLDRA does not give the right to submit political or other non work-related demands as grounds for a collective dispute. Trade unions may submit any demands that are not related to working conditions for discussion at meetings, demonstrations and pickets in accordance with the Trade Union Act and the Public Meeting Act.⁸

However, the Supreme Court has also established that, if the participants of the main strike submit political demands in addition to the demands regarding working conditions, the strike can still be considered lawful. This also applies if the participants of a sympathy strike submit political demands in addition to the demands relating to working conditions of the main strike.⁹

Forms of strike that are prohibited or limited

No particular form of strike is prohibited; however, the right to strike is limited depending on the objective of the strike – strikes that are organised for the purpose of influencing the work of the courts are unlawful.

Strikes, which are not preceded by negotiations and conciliation proceedings are also considered unlawful, as are strikes that are called or organised in violation of the procedure established by law. As a consequence, political strikes are in principle prohibited.

In Estonia, the lawfulness of a strike is decided on by the courts.

4. Who may participate in a strike?

According to Article 20 of CLDRA, participation in a strike is voluntary. It is prohibited to impede the performance of work by employees who are not participating in the strike.

Limitations on the right to strike

The right to strike is denied to civil servants working for governmental authorities and other state bodies and local government, as well as for the **Defence League** (the unified armed forces of the Republic of Estonia), courts and rescue service agencies. The law further clarifies that the prohibition to strike does not apply to persons who are employed under an employment contract in an institution or organisation. An exception is provided for rescue workers employed under an employment contract in a rescue service agency and persons employed under an employment contract in the Ministry of Defence, the Defence Resources Agency, the Defence Forces or the Defence League.

Institutions and other organisations specified in the CLDRA, whose right to strike is denied, must resolve collective labour disputes by means of negotiations, with the help of a public conciliator or in court (Article 21 of the CLDRA). Public conciliators are independent, impartial officials who help the parties to labour disputes reach mutually satisfactory resolutions (Article 8 of the CLDRA).

Article 59 of the Civil Service Act establishes that an **official** is not allowed to strike. An official is not allowed to participate in other collective pressure actions which interfere with the performance of functions of an authority that has recruited the official or of other authority arising from the law. The pressure action is collective if at least half of the officials of the authority participate therein.

The definition of official is included in Article 7 of the Civil Service Act: an official is a person who is in the public-law service and trust relationship with the State or local government. He or she is appointed to a post in an authority, which involves the exercise of official authority.

The exercise of official authority means the performance of the following functions:

1. the directing of an authority;
2. the exercise of state and administrative supervision, as well as the conduct of internal audit;
3. the ensuring of the security and constitutional order of the State;
4. the permanent military defence of the State and preparation therefor;
5. the proceeding of offences;
6. the diplomatic representation of the Republic of Estonia in foreign relations;
7. the taking of decisions necessary for the performance of the principal functions of the Parliament of Estonia (Riigikogu), the President of the Republic, the National Audit Office, the Chancellor of Justice and the courts, the substantive preparation or implementation thereof;

8. the substantive preparation or implementation of the policy-making decisions within the competence of the Government of the Republic, local government council, municipal or city government and authority;
9. the activities which, in the interests of strengthening and developing the official authority, cannot be given to the competence of a person who is only in the relationships governed by private law with the authority.

An official is distinguished from an employee in public administration. An **employee** is recruited for a job in an authority that does not involve the exercise of official authority but involves only work in support of the exercise of official authority. Accordingly, the ban on the right to strike does not apply to employees in public administration, except rescue workers employed under an employment contract in a rescue service agency and persons employed under an employment contract in the **Ministry of Defence, the Defence Resources Agency, the Defence Forces or the Defence League** (Article 21 of the CLDRA). Specific limitations have to be respected, for instance in the case of the duty to ensure a minimum level of services.

In addition, while permitting **sympathy strikes**, the CLDRA provides that individuals who are not employed by an enterprise, institution or other organisation where a labour dispute arises or who do not represent the employees pursuant to the procedure prescribed by law are prohibited from instigating a strike (Article 20 of the CLDRA).

Case law clarifies that the existence of a valid collective agreement (in force) does not prohibit sympathy strikes. The legitimacy of a sympathy strike depends on whether the main strike is legal (lawful). If a sympathy strike is held in support of two (different) major strikes, it can be legal even if one of the main strikes is legal and the other is illegal.¹⁰

Minimum level of services

For certain categories of employees, the CLDRA lays down the requirement to provide a minimum level of services. According to Article 21 of the CLDRA, the continuity of indispensable services or production must be ensured in enterprises and institutions which satisfy the **primary needs of the population and economy**. The minimum level of services or production that must be ensured during a strike is determined by agreement of the parties. The list of enterprises and institutions which satisfy the primary needs of the population and economy is established by the Government of the Republic of Estonia.

The list of essential services and institutions responsible for the provision thereof is provided in Article 36 of the Emergency Act:

- **The Ministry of Economic Affairs and Communications shall organise the continuity of the following vital services:**
 1. electricity supply;
 2. natural gas supply;
 3. liquid fuel supply;
 4. ensuring the operability of national roads;

5. phone service;
 6. mobile phone service;
 7. data transmission service;
 8. digital identification and digital signing.
- **The Ministry of Social Affairs shall organise the continuity of emergency care for the purposes of the Health Services Organisation Act.**
 - **The Bank of Estonia shall organise the continuity of the following vital services:**
 1. payment services;
 2. cash circulation.
 - **Local authorities which organise services provided by a provider of a vital service and on the territory of which over 10 000 residents live organise in their administrative territory the continuity of the following vital services:**
 1. district heating;
 2. ensuring the operability of local roads;
 3. water supply and sewerage.

Estonian case law has established that the provision of essential (vital) services is not directly dependent on the company's economic situation, and, secondly, the services of railway undertakings are not essential within the meaning of the CLDRA.¹¹

5. Procedural requirements

Procedural requirements are provided for in the CLDRA.

Pre-strike dispute resolution requirements

Article 13 of the CLDRA defines several conditions for the right to strike to arise:

- if conciliation procedures have been conducted but no conciliation has been achieved;
- if the agreement reached is not complied with;
- if a court judgment is not executed.

Strikes which are not preceded by negotiations and conciliation proceedings are declared unlawful. In the event of a strike, the parties to the collective labour dispute have an obligation to resume negotiations in order to reach an agreement in the collective labour dispute (Article 13 of the CLDRA).

Procedural requirements for adopting a decision to call a strike and declaring a strike

A decision to organise a strike is taken by the general meeting of employees or an association or a federation of employees. According to Article 5 of the Employees' Trustee Act, the general meeting of employees may be called by:

1. a trade union operating at the employer;
2. the majority of the members of a trade union who are employed with the employer if the trade union has not been founded at the employer; or
3. at least 10% of the employees of the employer.

The person who calls the general meeting must notify the employees of the reason for calling and the time of the general meeting at least two weeks in advance.

The law does not lay down any specific requirements for voting in order to approve a decision to call a strike. The trade union must adhere to its rules regarding the decision-making process. At least half of the company's workforce must participate in the general assembly of the employees (Article 6 of the Employees' Trustee Act). The law does not specify whether a simple or a qualified majority of the participants is required for a decision to be adopted.

The advance notice requirement is two weeks in the case of an actual strike, three days in the case of a warning strike and five days in the case of a sympathy strike.

If an actual strike is declared, the organisers of the strike are required to notify the other party, a public conciliator and the local government of a planned strike in writing at least two weeks in advance. The notice must set out the reasons, exact time of commencement and possible scope of the strike. An employer has a duty to inform its contracting partners, other interested enterprises or institutions and, through the media, the general public that a strike is taking place (Article 15 of the CLDRA).

In the case of a warning strike, the employees' trustee, trade union or federation of trade unions is required to notify the employer, association or federation of employers and the local government of a planned warning strike in writing at least three days in advance (Article 18(3) of the CLDRA).

In the case of a sympathy strike, the employees' trustee, trade union or federation of trade unions is required to notify the employer, association or federation of employers and the local government of the planned sympathy strike in writing at least five days in advance (Article 18(4) of the CLDRA).

Procedural requirements during the strike

A strike is directed by a strike leader or leaders – a person authorised by the general meeting of employees or trade union. The strike leader represents the interests of those who authorised the strike and informs the public through the media about the course of the resolution of the collective labour dispute. The strike leader is required to apply measures to preserve the assets of the other party and to maintain the rule of law and public order, and is liable for violations of law and damage caused by the strike.

The authority of the strike leader terminates if the parties sign a conciliation (agreement), if the strike is declared unlawful by a court, or on the basis of a decision of the bodies authorising the strike leader (Article 16 of the CLDRA).

Postponement or suspension of the strike

According to Article 19 of the CLDRA, the commencement of a strike may be postponed once on the proposal of the public conciliator:

- by one month by the Government; or
- by two weeks by the city or rural municipality government.

The Government has the right to suspend a strike in the case of a natural disaster or catastrophe, in order to prevent the spread of an infectious disease or in a state of emergency (Article 19 of the CLDRA).

Minimum continuation of services

The minimum level of essential services to be provided is determined by agreement of the parties. In the case of disagreements, the minimum level of services is determined by the public conciliator whose decision is binding on the parties (Article 21(3) of the CLDRA).

6. Legal consequences of participating in a strike

In the case of a lawful strike:

- it is prohibited to terminate the employment contracts of participants in lawful strikes on the initiative of the employer;
- employees are not paid wages for the period of a strike;
- participation in a strike is not considered a violation of the relevant employment contract and does not result in the liability of the employee;
- upon the full or partial satisfaction of the demands of employees or an association or a federation of employees, the employer pays compensation in an amount agreed upon by the parties to the employees or the association or federation of employees who called the strike;
- by agreement of the parties to a collective labour dispute, participants in a strike may make up for the time lost by reason of the strike outside working time. The time spent making up for the time lost by reason of a strike is not deemed to be overtime or work on days off or public holidays (Articles 24, 25 and 28 of the CLDRA).

The CLDRA establishes that an employee who does not participate in a strike but who is unable to perform his or her work by reason of the strike will be remunerated by the employer on the same bases as for the period of work stoppages which are not the fault of the employee or to the extent prescribed by a collective agreement (Article 25(2) of the CLDRA).

If a strike is found to be unlawful by a decision of the court:

- participation in the strike is considered a violation of the relevant employment contract and will result in the liability of the employee if the employee is the organiser of the strike;
- resuming a strike that has been declared unlawful or suspended, or commencing/resuming a strike that has been postponed before the specified time, is punishable by a fine of up to 200 fine units or by detention;
- organisation of the commencement or resumption of a strike declared unlawful or suspended or postponed before the specified time is punishable by a fine of up to 300 fine units or by detention (Articles 23², 23³ and 24 of the CLDRA).

In addition, Article 26⁴ of the Trade Unions Act states that failure by an elected representative of a trade union to ensure observance of the obligation to refrain from striking during a period prescribed by law or a collective agreement is punishable by a fine of up to 100 fine units.

7. Case law of international/European bodies on standing violations

International Covenant on Civil and Political Rights

In its Concluding observations on the third periodic report submitted by Estonia on the implementation of the International Covenant on Civil and Political Rights (adopted at its ninety-ninth session on 27 July 2010¹²), the Human Rights Committee (HRC) noted the following as a principal matter of concern and recommendation:

15. While noting that the present draft Public Service Act presented to Parliament includes a provision restricting the number of public servants not authorized to strike, the Committee is concerned that public servants who do not exercise public authority do not fully enjoy the right to strike (art. 22).

The State party should ensure in its legislation that only the most limited number of public servants is denied the right to strike.

International Committee on Economic, Social and Cultural Rights

The Committee on Economic, Social and Cultural Rights considered the second periodic report of Estonia on the implementation of the International Covenant on Economic, Social and Cultural Rights adopted, at its 59th meeting held on 2 December 2011. The committee made the following concluding observations.¹³

17. The Committee notes with concern that the legislation in force in the State party prohibits civil servants from participating in strikes, including those who do not perform essential services.

The Committee calls on the State party to ensure that the provisions on civil servants' right to strike in the Public Service Act comply with article 8 of the Covenant by restricting the prohibition of strike to those discharging essential services.

International Labour Organisation

ILO Convention No. 87 concerning Freedom of Association and Protection of the Right to Organise

Decisions of the Committee of Freedom of Association (CFA)

Case No. 2543 (complaint date: 31 January 2007), regarding a complaint submitted by the Confederation of Estonian Trade Unions (EAKL), concerns the right to strike in the public service and the right of public servants to bargain collectively, particularly with regard to wages.

The EAKL alleged legislative restrictions on the right to strike imposed on workers in the public service. In its comments, the CFA referred to Article 21 of the CLDRA, according to which strikes are prohibited in **government agencies and other state bodies and local government**, and the list of minimum services is established unilaterally by the Government.¹⁴

The CFA concluded that the determination of **minimum services** and the **minimum number of workers** providing them should involve not only the public authorities, but also the relevant employers' and workers' organisations. This not only allows a careful exchange of viewpoints on what, in a given situation, can be considered to be the minimum services that are strictly necessary, but also contributes to guaranteeing that the scope of the minimum service does not result in the strike becoming ineffective in practice because of its limited impact, and to dissipating possible impressions in the trade union organisations that a strike has come to nothing because of over-generous and unilaterally fixed minimum services.

As regards **restrictions on the right to strike for public servants**, the CFA recalled that public servants in state-owned commercial or industrial enterprises should have the right to negotiate collective agreements, enjoy suitable protection against acts of anti-union discrimination and enjoy the right to strike, provided that the interruption of services does not endanger the life, personal safety or health of the whole or part of the population.¹⁵

Committee of Experts on the Application of Conventions and Recommendations (CEACR)

In its observations 2009, the CEACR has addressed Article 21 of the CLDRA regulating the **restrictions on the right to strike**. The CEACR requested the Government to indicate the progress achieved in respect of the adoption of legislative provisions ensuring that the right to strike may be prohibited only in essential services in the strict sense of the term (i.e. services the interruption of which would endanger the life, personal safety or health of the whole or part of the population) and for public servants exercising authority in the name of the State.

In its Observation adopted in 2011, the CEACR expressed the hope that the Government will take the necessary measures to ensure that the right to strike is guaranteed to all public servants, with the only possible exception of those exercising authority in the name of the State.¹⁶

In its Observations adopted in 2014, and noting the Government's indication that the Ministry of Social Affairs has prepared the first version (working document) of the draft Collective Bargaining and Collective Labour Dispute Resolution Act, the CEACR welcomed the information provided by the Government and hopes that the new Act will be adopted in the near future and requested the Government to provide a copy thereof once it is adopted.¹⁷

European Social Charter

Conclusions on Article 6(4) of the European Committee of Social Rights (ECSR)

Regarding Article 21 of the CLDRA, the ECSR, in its Conclusions 2004, recalled that the **right to strike of civil servants** may be restricted because they perform duties affecting the public interest or national security. However, a denial of the right to strike to civil servants as a whole cannot be deemed in conformity with the Charter. The ECSR concluded in 2014 that the situation in Estonia is not in conformity with Article 6(4) of the Revised Charter because almost all civil servants are denied the right to strike.¹⁸

Following legislative developments in 2014, the ECSR noted the adoption of the Public Service Act in June 2012 providing that the ban on the right to strike is restricted to public servants exercising authority in the name of the State. The ECSR stressed that, in the case of civil servants who are not exercising public authority, only a restriction can be justified, not an absolute ban. According to these principles, all public servants who do not exercise authority in the name of the State can have recourse to strike action in defence of their interests.

As regards **restrictions to the right to strike in the public service**, the ECSR asked in 2014 the Government to state, in relation to every service subject to restrictions with regard to the right to strike, if and to what extent work stoppages may undermine respect for the rights and freedoms of others or threaten the public interest, national security, public health or morals.

With regard to establishing a list of **minimum services**, the ECSR noted in 2014 that it is essential that, even if the final decision is based on objective criteria prescribed by law, workers or their representative bodies are regularly involved in determining, on an equal footing with employers, the nature of a 'minimum service'. The Committee was concerned about how the workers are involved in such procedures in Estonia and what are the means available to workers in case there is no agreement on the establishment of such minimum service.¹⁹

In its Conclusions 2018, the ECSR found that according to the national report, public servants are divided into two main categories – officials and employees. Officials exercise official authority. Employees are recruited for the jobs which do not involve the exercise of official authority but only support the exercise of official authority - primarily in accounting, human resource work, records management, activities of procurement specialists, activities of administrative personnel, activities of information technologists or other work in support of the exercise of official authority. Restrictions on the right to strike are not applicable to employees in public service.

The Committee recalled that the right to strike of certain categories of public servants may be restricted, in particular members of the police and armed forces, judges and senior civil servants. However, the denial of the right to strike to public servants as a whole cannot be regarded as compatible with the Charter (cf. Conclusions I (1969)). Under Article G of the

Charter, restrictions on the right to strike are acceptable only if they are prescribed by law, pursue a legitimate aim and are necessary in a democratic society for the protection of the rights and freedoms of others or for the protection of public interest, national security, public health, or morals (Conclusions X-1 (1987), Norway (under Article 31 of the Charter)). The ECSR thus concluded that the situation in Estonia is not in conformity with Article 6§4 of the Charter on the ground that all public servants exercising authority in the name of the state are denied the right to strike and this blanket prohibition goes beyond the limits permitted by Article G of the Charter.²⁰

8. Recent developments

Estonia's trade unions have raised the concern that the ban on strikes in the public service is too broad and seriously limits the possibilities of employees in the civil service to defend their rights.²¹ The trade unions have recalled the position of the Committee of Freedom of Association of the ILO that, where the right to strike is restricted or prohibited, adequate protection should be given to workers in order to compensate for the limitations.

Nevertheless, the Government has failed to implement an effective, impartial and rapid mechanism for civil servants or for employees in essential services.

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Notes

¹ For an overview of all ILO Conventions ratified by Estonia, see

https://www.ilo.org/dyn/normlex/en/f?p=1000:11200:0::NO:11200:P11200_COUNTRY_ID:102620

² The Constitution of the Republic of Estonia, passed on 28 June 1992, entered into force on 3 July 1992:

<https://www.riigiteataja.ee/en/eli/530102013003/consolide>.

³ The Collective Labour Dispute Resolution Act (CLDRA), passed on 5 May 1993, entered into force on 7 June 1993:

<https://www.riigiteataja.ee/en/eli/511112014002/consolide>.

⁴ The Trade Unions Act, passed on 14 June 2000, entered into force on 23 July 2000:

<https://www.riigiteataja.ee/en/eli/518112013006/consolide>.

⁵ The Civil Service Act, passed on 13 June 2012, entered into force on 1 April 2013:

<https://www.riigiteataja.ee/en/eli/509072014003/consolide>.

⁶ The Emergency Act, passed on 8 February 2017, entered into force on 1 July 2017:

<https://www.riigiteataja.ee/en/eli/513062017001/consolide>.

⁷ The Employees' Trustee Act, passed on 13 December 2006, entered into force on 1 February 2007:

<https://www.riigiteataja.ee/en/eli/510012014001/consolide>.

⁸ The Public Meeting Act, passed on 26 March 1997, entered into force on 2 May 1997:

<https://www.riigiteataja.ee/en/eli/514112013003/consolide>.

⁹ Case No. 3-2-1-159-13 of the Supreme Court, decision of 19 December 2013, *Eesti Energia Narva Elektrihaamad AS-i hagi NARVA ENERGIA AMETIÜHINGU vastu streigi korraldamise õiguse puudumise tuvastamiseks*, paragraphs 15-18.

¹⁰ Case No. 3-2-1-159-13 of the Supreme Court, decision of 19 December 2013, *Eesti Energia Narva Elektrihaamad AS-i hagi NARVA ENERGIA AMETIÜHINGU vastu streigi korraldamise õiguse puudumise tuvastamiseks*.

¹¹ Decision of the Harju County Court Kentmanni Courthouse (*Harju Maakohus Kentmanni kohtumaja*) of 5 December 2012 in Case No. 2-12-9463, paragraph 22.5.

¹² Available at

https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=CCPR%2fC%2fEST%2fCO%2f3&Lang=en

¹³ Available at

https://tbinternet.ohchr.org/_layouts/treatybodyexternal/Download.aspx?symbolno=E%2fC.12%2fEST%2fCO%2f2&Lang=en

¹⁴ "Article 21. Restrictions on right to strike

(1) Strikes are prohibited:

1. in government agencies and other state bodies and local governments;

2. in the defence forces, other national defence organisations, courts and firefighting and rescue services;

(2) Agencies or other organisations specified in subsection (1) of this section shall resolve collective labour disputes by negotiations, through the mediation of a conciliator or in court.

(3) In enterprises and agencies which satisfy the primary needs of the population and economy, the body which calls a strike or locks out employees shall ensure indispensable services or production which shall be determined by the agreement of the parties. In the case of disagreement, indispensable services or production shall be determined by the Public Conciliator whose decision is binding on the parties.

(4) A list of enterprises and agencies which satisfy the primary needs of the population and economy shall be established by the Government of the Republic."

¹⁵ CEACR Definitive Report No. 350, June 2008, Case No. 2543 (Estonia):

http://www.ilo.org/dyn/normlex/en/f?p=1000:50002:0::NO:50002:P50002_COMPLAINT_TEXT_ID:2910603, paragraphs 728-729.

¹⁶ Observation (CEACR) – adopted 2011, published 101st ILC session (2012); Observation (CEACR) – adopted 2009, published 99th ILC session (2010).

¹⁷ Observation (CEACR) – adopted 2013, published 103rd ILC session (2014).

¹⁸ ECSR Conclusions 2004 – Estonia – Article 6(4).

¹⁹ ECSR Conclusions 2014 – Estonia – Article 6(4).

²⁰ ECSR Conclusions 2018 – Estonia – Article 6(4).

²¹ 'Workers' rights in the Baltics. An analysis of the Baltic States: Determining whether any given legislation or practice complies with the ILO Core Conventions and Convention 144 on Tripartite Consultation. Strategy for developing workers' rights in the Baltic States by strengthening social dialogue and compliance with the ILO Core Conventions.' Report published by the Council of Nordic Trade Unions (NFS), 12 October 2017, p. 110: <http://www.nfs.net/aktuellt/ilo/workers-rights-in-the-baltic-countries-33924881>.