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Committee on Economic, Social and Cultural Rights

Concluding observations on the sixth periodic report of Italy*

1. The Committee considered the sixth periodic report of Italy¹ at its 38th and 39th meetings, held on 29 and 30 September 2022², and adopted the present concluding observations at its 60th meeting, held on 14 October 2022.

A. Introduction

2. The Committee welcomes the submission by the State party of the sixth periodic report, based on the list of issues prior to reporting drawn up by the Committee.³ The Committee expresses its appreciation to the State party for having accepted the simplified reporting procedure, as it provides an opportunity for focused consideration of the report and dialogue with the delegation. The Committee appreciates the constructive dialogue with the State party's delegation.

B. Positive aspects

3. The Committee welcomes the ratification of the Convention for the Protection of All Persons from Enforced Disappearance in 2015.

4. The Committee also welcomes the legislative, institutional and policy measures taken to increase the protection of economic, social and cultural rights in the State party, such as the adoption of Law No. 32 of April 2022 (the Family Act) aiming at improving the quality of life of families with children, and Law No. 26 of March 2019 (the Citizens' Income Law), Italy's second National Action Plan on Business and Human Rights (2021-2026), and the measures mentioned in the present concluding observations.

C. Principal subjects of concern and recommendations

Domestic application of the Covenant

5. The Committee remains concerned about the absence of court decisions invoking provisions of the Covenant, and the lack of specialized training for judges, prosecutors and lawyers on the justiciability of the provisions of the Covenant. The Committee is also concerned about the lack of awareness of the State party's obligations under the Covenant among public officials, especially those responsible for its implementation (art. 2 (1)).

* Adopted by the Committee at its seventy-second session (26 September -14 October 2022).

¹ [E/C.12/ITA/6](#)

² [E/C.12/2022/SR.38](#) and [E/C.12/2022/SR.39](#)

³ [E/C.12/ITA/QPR/6](#)

6. **The Committee recommends that the State party:**
- (a) **Regularly provide specialized training on the provisions of the Covenant and their justiciability for judges, prosecutors and lawyers;**
 - (b) **Enhance awareness of economic, social and cultural rights among State actors responsible for the implementation of the Covenant, such as law enforcement agencies, labour inspectors, social workers, health-care personnel and teachers;**
 - (c) **Systematize a human rights impact assessment in the process of formulating legislation and policies in the areas of economic, social and cultural rights;**
 - (d) **Be guided by and follow the Committee's General comment No 9 on the domestic application of the Covenant.⁴**

National human rights institution

7. The Committee regrets the continued lack of concrete results with respect to the establishment of an independent national human rights institution despite years of consideration by the State party (art. 2 (1)).

8. **The Committee urges the State party to establish an independent national human rights institution with a broad mandate in line with the principles relating to the status of national institutions for the promotion and protection of human rights (the Paris Principles⁵), allocating sufficient human, technical and financial resources for it to fully exercise its mandate in relation to economic, social and cultural rights. In this regard, the Committee recalls its General comment 10 on the role of national human rights institutions in the protection of economic, social and cultural rights.⁶**

Civil society, human rights defenders and journalists

9. The Committee is concerned about repeated allegations of harassment, physical threats, and verbal attacks by both non-State and State actors on human rights defenders and journalists advocating for economic, social and cultural rights, particularly in the context of protection of refugees (art. 5).

10. **The Committee recommends that the State party guarantee the effective protection, including by expanding personal protection programmes, of independent journalists, human rights defenders and other activists.**

Regional disparities

11. The Committee is concerned about persistent regional disparities in access to social services, and insufficient measures taken to address these, the low and varying levels of financial and administrative capacity of local governments, and the lack of coordination between the national and local governments (art. 2 (1)).

12. **The Committee recommends that the State party:**
- (a) **Strengthen the financial and administrative capacity of local governments with a view to ensuring that people in the State party enjoy Covenant rights on an equal basis regardless of the region in which they live;**
 - (b) **Increase transfer of public funds from wealthier, Northern regions to poorer, Southern regions;**
 - (c) **Make increased use of the possibilities to obtain funding for regional development projects, as a member of the European Union, from the European Regional Development Fund.**

⁴ E/C.12/1998/24

⁵ A/RES/48/134

⁶ E/C.12/1998/25

Business and human rights

13. Noting the State party's adoption of its second National Action Plan on Business and Human rights (2021-2026), the Committee is concerned that the Legislative Decree 231/2001 does not adequately cover corporate abuses of human rights and provides for exemption from liability if companies demonstrate they have adopted an adequate model of risk prevention and management. The Committee is also concerned that the legal and regulatory framework regarding due diligence does not sufficiently encompass sub-suppliers, including foreign ones (art. 2 (1)).

14. **The Committee recommends that the State party:**

(a) Amend the Legislative Decree 231/2001 to abolish the exemptions of liability for business entities and to cover abuses of all human rights;

(b) Mandate business entities' legal responsibility and due diligence responsibilities to the whole supply chain, including sub-suppliers, at home and abroad;

(c) The Committee encourages the State party to include those elements in future national action plans on business and human rights and be guided by and follow the Committee's general comment No. 24 (2017) on State obligations under the International Covenant on Economic, Social and Cultural Rights in the context of business activities.⁷

Arms exports

15. The Committee is concerned that human rights impact assessments into arms export control mechanisms have been inadequate, and that past and recent arms transfers and export from the State party to countries that have subsequently used the arms in conflict zones may have facilitated human rights violations. The Committee is also concerned about reports that the non-transparent nature of granting arms licences leads to corruption and malpractices (art. 2 (1)).

16. The Committee recommends that the State party conduct thorough risk assessments prior to granting licences for arms exports and refuse or suspend such licences when there is a risk that arms could be used to violate human rights, including economic, social and cultural rights, and that all arms transfers and exports comply with the State party's obligations under the Arms Trade Treaty.

Climate change (see art 11 for adaptation)

17. The Committee is concerned that current emission-reducing policies may not be sufficient for the State party to observe its obligations under the Paris Agreement, and that unsustainable practices have an adverse impact on climate change beyond the State party's borders (art. 2 (1)).

18. **The Committee recommends that the State party:**

(a) Take measures to achieve its nationally determined contributions under the Paris Agreement by, inter alia, increasing taxation of emissions;

(b) Make all efforts to replace fossil fuel in its energy mix, including by increasing renewable energy as an alternative;

(c) Be guided by and follow the Committee's statement on Climate change and the International Covenant on Economic, Social and Cultural Rights.⁸

Maximum available resources

19. The Committee is also concerned about the recent years' decrease of the tax rates on corporate income, the persistent relatively high value-added tax rates that are in themselves regressive, and the very low inheritance tax rate, all of which contribute to narrowing the

⁷ E/C.12/GC/24

⁸ E/C.12/2018/1

fiscal space. The Committee is also concerned about the timely implementation of the National Recovery and Resilience Plan, potentially hampering the transfer of funds needed for post-pandemic financial and economic recovery (art. 2 (1)).

20. **The Committee recommends that the State party readjust its tax system's structure in a more progressive direction by revisiting the revenue deriving from taxes levied on corporations' income, the value-added tax rates, and the inheritance tax rate with a view to expanding the tax base and fiscal space for the progressive realization of economic, social and cultural rights, and to increasing its redistributive effect. The Committee also recommends that the State party adhere to the National Recovery and Resilience Plan implementation.**

Official Development Assistance

21. The Committee is concerned that the State party's Official Development Assistance remains well below the United Nations' official target of 0.7 % of the Gross National Income.

22. **The Committee takes note of the State party's stated intention to increase its Official Development Assistance to the United Nations' official target of 0.7 % of the Gross National Income by 2030 and recommends that the State party implement, without delay, this increase to said level.**

Corruption

23. Noting the strengthening of the anti-corruption legal framework with the adoption of Law No.3/2019, the Committee remains concerned that corruption continues to be pervasive within the State party, including in the judiciary. It is also concerned about the inadequate and under-resourced institutions empowered to curb corruption (art. 2 (1)).

24. **The Committee reiterates its recommendation⁹ that the State party investigate all allegations of corruption, including in the judiciary, and ensure effective implementation of the anti-corruption law. It also recommends that the State party allocate sufficient resources to anti-corruption institutions, implement a zero-tolerance policy against corruption and ensure effective protection of victims of corruption, whistle-blowers, and their lawyers.**

Austerity measures and public debt

25. Noting the State party's measures to reduce the public debt following the financial crisis, the Committee is concerned about the significant continued adverse impact of these austerity measures on the enjoyment of economic, social and cultural rights, and particularly budget cuts to the health care sector which exacerbated the effects of the COVID-19 pandemic. The Committee is also concerned that budget deficit and debt control might require the adoption of further austerity measures and reduce the State party's capacity to meet its obligation to mobilize the maximum available resources, as well as the ability to adequately fund the health care system (arts. 2 (1), 6, 9 and 11).

26. **The Committee recommends that the State party:**

(a) **Assess the impact on the Covenant rights when making budgetary adjustments and take all necessary measures to ensure that any negative impact is reduced to the minimum, paying particular attention to adequately prioritizing the health care sector;**

(b) **Be guided by and follow the Committee's open letter dated 16 May 2012 to States parties on economic, social and cultural rights in the context of the economic and financial crisis, and its statement on public debt, austerity measures and the Covenant issued in 2016.¹⁰**

⁹ E/C.12/ITA/CO/5 para 11

¹⁰ E/C.12/2016/1

Discrimination

27. The Committee is concerned about recent instances of hate speech inciting animosity towards sexual orientation, and migrant, religion and race-based communities, including proposals to deprive these communities of their economic, social and cultural rights (art. 2 (1)).

28. **The Committee recommends that the State party adopt comprehensive anti-discriminatory policies and laws to strengthen the protection of economic, social and cultural human rights for all persons against all forms of discrimination, including hate speech. In this regard, the Committee recalls its General Comment No. 20 on non-discrimination in economic, social and cultural rights.¹¹**

Persons with disabilities

29. The Committee shares the concerns of the Committee on the Rights of Persons with Disabilities¹² that national legislation lacks a definition of reasonable accommodation and does not include an explicit recognition that the denial of reasonable accommodation constitutes disability-based discrimination,¹³ and that social protection programmes do not meet the requirements of persons with disabilities (art. 2 (2)).

30. **The Committee recommends that the State party enact legislation that explicitly recognize the denial of reasonable accommodation as disability-based discrimination across all areas of life, including within public and private sectors, as also recommended by the Committee on the Rights of Persons with Disabilities.¹⁴ The Committee also recommends that the State party ensure that social protection programmes meet the requirements of the diverse range of persons with disabilities on an equal basis with others, as required by the Committee on the Rights of Persons with Disabilities.¹⁵**

Migrants, asylum seekers and refugees

31. The Committee remains concerned about the limited enjoyment of the Covenant rights by migrants, asylum seekers and refugees upon arrival in the State party. The Committee is also concerned that the Law No. 132 of December 1, 2018, on immigration and citizenship has contributed to a rise in the number of irregular migrants in the State party and has increased their risk of exploitation. Furthermore, the Committee is concerned that unclear communication pertaining to various regularization campaigns discouraged applications for regularization (art. 2 (2)).

32. **In implementing its Covenant obligations towards the protection and promotion of human rights of migrants, asylum seekers and refugees, it is recommended that the State party seek and strengthen international cooperation and assistance, in particular with other European Union member states. The Committee also recommends that the State party review the Law No. 132 of December 1, 2018, with the aim of increasing the regularization of migrants, and that the State party should ensure legal and communicative certainty and clarity in regularization instruments and campaigns.**

Equality between men and women

33. The Committee remains concerned that gender role stereotypes persist and that women's representation in the judiciary and senior positions within the public administration remains unsatisfactory. The Committee is also concerned about the much lower labour market participation rate of women and the concentration of women in traditionally female-dominated professions, contributing negatively to the gender pay gap (arts. 3 and 7).

34. **The Committee recommends that the State increase its efforts to combat gender stereotypes, including by increasing the use of the media and awareness-raising**

¹¹ E/C.12/GC/20

¹² CRPD/C/ITA/CO1 para 9

¹³ CRPD/C/ITA/CO/1 para 9

¹⁴ CRPD/C/ITA/CO/1 para 6 and 10

¹⁵ CRPD/C/27/D/51/2018 para 8 (b) (i)

campaigns and enhancing women's participation in the judiciary and senior public positions, including by considering quotas. The Committee also recommends that the State party intensify its efforts to close the gender pay gap, including by addressing the gender-based segregation in the labour market, reviewing its social and tax policies and addressing the factors that discourage women from continuing their careers or taking up full-time employment. In this regard, the Committee recalls its general comment No. 16 (2005) on the equal rights of men and women to the enjoyment of all economic, social and cultural rights,¹⁶ as well as its previous recommendations.¹⁷

Unemployment

35. The Committee is particularly concerned that the youth unemployment rate for women has recently increased and remains stagnant compared to the last periodic report. The Committee remains concerned that the unemployment rate remains high in the State party for the youth, persons with disabilities, in the southern regions and on the islands (art. 6).

36. Recalling its recommendations,¹⁸ the Committee recommends that the State party increase its efforts to address unemployment, for example by implementing targeted public sector employment schemes paying particular attention to the youth and in particular to young women, persons with disabilities, and by expanding localized employment programmes in the Southern provinces and on the islands.

Informal economy, security in employment and social protection

37. The Committee reiterates its concern about the considerable proportion of workers in the informal economy in the State party, that such workers are not adequately covered by labour and social protection laws, and the punitive approach taken by the State party towards such workers (arts. 7 and 9).

38. The Committee reiterates its recommendation¹⁹ that the State party adopt a holistic approach in addressing the informal economy and take all measures necessary to reduce the extent of the informal economy and to increase employment opportunities in the formal labour market.

Working conditions

39. The Committee is concerned about the abuse of human rights relating to business activities, including inhumane living and working conditions, occupational health hazards, exposure to pollution, and exploitative practices by employers, especially of migrant workers, in the agriculture, construction, and garment and textile industries (art. 7).

40. The Committee recommends that the State party adequately monitors conditions in the above-mentioned industries, including by raising the level of fines to employers and increasing the number of unannounced inspections by the National Labour Inspectorate. In this regard, the Committee recalls its General comment No. 23 (2016) on the right to just and favourable conditions of work.²⁰

Old-age pensions

41. The Committee is concerned that the medium to long-term financial sustainability of the pension system is negatively affected by the lack of sufficient measures to adjust to the relatively rapidly ageing population, and that this may negatively affect retirees' enjoyment of economic and social rights. The Committee is also concerned that the minimum requirements for obtaining the right to earlier retirement age for those working in particularly strenuous and heavy activities may not be adequately flexible to allow those in need of early retirement to benefit from such (art. 9).

¹⁶ E/C.12/2005/4

¹⁷ E/C.12/ITA/CO/5 para 23

¹⁸ E/C.12/ITA/CO/5 para 25

¹⁹ E/C.12/ITA/CO/5 para 29

²⁰ E/C.12/GC/23

42. **The Committee recommends that the State party ensure the medium to long-term financial sustainability of the old-age pension system without negatively affecting retirees' enjoyment of economic and social rights. This could include, for example, reducing the number of exceptions to the raise of the retirement age and letting it gradually rise for all categories of persons in tandem with the increase in the average lifespan. Simultaneously, the Committee recommends that the State party adapt the requirements for an early retirement allowing for a more flexible allocation in individual cases.**

Poverty

43. The Committee is concerned about the persistent high rates of poverty, which in some areas have increased in recent years, especially in light of the COVID-19 pandemic. It remains particularly concerned about the high rate of child poverty, the disproportionately high level of absolute poverty among non-nationals, and the regional disparities in poverty prevalence (art. 11).

44. **The Committee urges the State party to redouble its efforts to address poverty while paying particular attention to child poverty, poverty in the Southern provinces, and poverty among non-nationals not included in the citizen's income programme (*reddito di cittadinanza*), including by considering increasing direct cash transfers to the most disadvantaged and marginalised. In this regard, the Committee recalls its recommendation²¹ and refers to its statement on poverty and the International Covenant on Economic, Social and Cultural Rights.²²**

Right to adequate housing

45. The Committee is concerned that the most disadvantaged and marginalized groups' ability to afford adequate housing is threatened by rising prices. The Committee is also concerned that Roma people continue to live in settlements where basic facilities are inadequate or lacking, that de-facto residential segregation of Roma communities persists; and that Roma are subject to discrimination when seeking housing on the private rental market (art. 11).

46. **The Committee recommends that the State party increase housing subsidies for those unable to obtain affordable housing and ensure sustainable access to basic facilities necessary for adequate housing. The Committee also recommends that the State party adopt targeted housing measures for Roma to prevent any direct and indirect discrimination against Roma. In these regards, the Committee recalls its General comment No. 4 on the right to adequate housing.²³**

Food security

47. The Committee is concerned about the impact of the rising cost of food on the most disadvantaged and marginalized groups, including migrants, persons and families with low income, and persons living in the Southern regions (art. 11).

48. **The Committee urges the State party to take immediate action to address the rising food costs, including by adopting emergency action plans incorporating clear-cut targets for ensuring adequate access to food for all persons in the State party, and enact and/or increase subsidies to food banks and other charitable organizations that provide food aid.**

Agricultural policy

49. The Committee is concerned that the increasing severity and occurrence of droughts in recent years has made small-scale farmers increasingly vulnerable to aggressive land purchases by large farming businesses or developers. Furthermore, the Committee is

²¹ [E/C.12/ITA/CO/5 para 39](#)

²² [E/C.12/2001/10](#)

²³ [General comment No. 4: The right to adequate housing \(art. 11 \(1\) of the Covenant\)](#)

concerned that the imbalanced power-structure of the food economy forces producers to take shortcuts that either increase production, such as the aggressive use of pesticides, or cut production costs, such as lowering salaries for farm workers and offering far less than the minimum wage or compromising safety measures (art. 11).

50. **The Committee recommends that the State party support the income of smallholders in order to reduce their production costs, further increase the monitoring of the use of banned pesticides, and establish positive incentives and assistance for organic and biodynamic farming and natural wine production. In this regard, the Committee recalls the recommendations of the Special Rapporteur on the Right to Food.**²⁴

Climate change adaptation

51. The Committee is concerned that the environmental consequences of climate change have a considerable impact on the enjoyment of economic, social and cultural rights in the State party, including an increase in and severity of heatwaves that have disproportionately impacted the health of older persons, sea-level rises, degradation of arable land, droughts, storms, and lack of freshwater resources (art. 11).

52. **The Committee recommends that the State party take all adaption measures necessary to protect the environment and address environmental degradation, taking into account its effects on economic, social and cultural rights. This could, for example, take the form of concrete, detailed and locally-oriented contingency planning for heatwaves including action plans for homes for older persons, water rationing, expansion of drip-irrigation techniques, dike-building, and storm-proofing of public and private buildings.**

Right to health

53. The Committee remains concerned about lack of access to basic health-care services adversely affecting populations living in the Southern provinces. The Committee is also concerned about the broader health care system's viability due to the built-up backlog from operations, procedures and medical examinations being postponed during the COVID-19 pandemic (art. 12).

54. **Recalling its recommendation,**²⁵ **the Committee recommends that the State party increase health-care funding to poorer regions' basic health-care services with a view to bridging the north/south gap and ensuring equal access to health care. It also recommends that the State party earmark additional funding to specifically reduce the health care system's backlog from the COVID-19 pandemic. In this regard, the Committee recalls its General comment No. 14 on the right to the highest attainable standard of health.**²⁶

Obesity

55. The Committee is concerned about the persistent high levels of child obesity, particularly in the Southern regions (art. 12).

56. **The Committee reiterates its recommendation**²⁷ **that the State party introduce higher taxes on junk foods and sweet beverages, lower taxes on healthy food products, ensure mandatory physical exercise in the primary school system, and increase earmarked funding to Southern regions' anti-obesity programmes for children.**

Sexual and reproductive rights

57. The Committee remains concerned about the continued limited availability of, and accessibility to, abortion services, exacerbated by health personnel conscientiously objecting

²⁴ [A/HRC/43/44/Add.5 para 115 h\) and m\)](#)

²⁵ [E/C.12/ITA/CO/5 para 47 a\)](#)

²⁶ [E/C.12/2000/4](#)

²⁷ [E/C.12/ITA/CO/5 para 51](#)

to carrying out such operations, leading pregnant women to undergo unsafe abortions (art. 12).

58. **The Committee reiterates its recommendation²⁸ that the State party guarantee access to abortion services and appropriate referral services and ensure that the exercise of conscientious objection by health-care personnel does not pose an obstacle for women who wish to terminate a pregnancy. In this regard, the Committee recalls its General Comment No. 22 (2016) on the right to sexual and reproductive health.²⁹**

Drug use

59. The Committee is concerned about the punitive approach to drug use and the insufficient availability of harm reduction programmes (art. 12).

60. **The Committee recommends that the State party review its drug policy and legislation to bring them into line with international human rights norms and best practices, and improve the availability, accessibility and quality of harm reduction programmes.**

Right to education

61. The Committee is concerned that Italy's school dropout rate remains among the highest in the European Union, especially in the Southern regions and among foreign-born children, and about the disproportionate negative effect on Southern, Roma and foreign-born children's learning during the COVID-19 pandemic (art. 13).

62. **The Committee reiterates its recommendation³⁰ that the State party redouble its efforts to reduce the school dropout rate, pay particular attention to the tendency in the Southern regions and intensify its efforts to ensure that foreign-born and Roma children enjoy equal opportunities in access to quality primary education.**

Cultural rights

63. The Committee is concerned that the sociocultural diversity of the State party is not adequately reflected in mainstream media, including state-controlled media, in a context of increasing domestic political focus on strengthening traditional cultural values at the expense of diversity and minorities' culture (art. 15).

64. **The Committee recommends that the State party provide increased financial and administrative support to programmes aimed at preserving, promoting and developing the culture, language, religion and traditions of minorities, including through mainstream and/or state-owned media.**

Right to science

65. The Committee is concerned that some unreasonable restrictions and limitations imposed by Law No 40/2004 might effectively hinder scientific research, as such restrictions are not compatible with the right to benefit from scientific progress and the obligation of the State party to respect the freedom indispensable for scientific research (art. 15).

66. **The Committee recommends that the State party review Law 40/2004 in order to remove such unreasonable restrictions.**

Digital divide

67. The Committee is concerned about the persistence of the digital divide which is relatively high, disproportionately affecting poor people in rural areas, in the Southern regions and on the islands (art. 15).

²⁸ [E/C.12/ITA/CO/5 para 49](#)

²⁹ [E/C.12/GC/22](#)

³⁰ [E/C.12/ITA/CO/5 para 53](#)

68. The Committee recommends that the State party take appropriate measures to narrow the digital divide for the benefit of the poor, older persons, and rural populations, in the Southern regions and on the islands, including by providing financing to local governments to install fibre optic cables to provide internet in these areas.

D. Other recommendations

69. The Committee recommends that the State party consider ratifying the International Convention on the Protection of the Rights of All Migrant Workers and Members of Their Families.

70. The Committee recommends that the State party coordinate with the Committee's Working Group on Communications to address concerns of Covenant violations received through individual communications by the Committee.

71. The Committee recommends that the State party take fully into account its obligations under the Covenant and ensure the full enjoyment of the rights enshrined therein in the implementation of the 2030 Agenda for Sustainable Development at the national level, including in the recovery from the COVID-19 pandemic. Achievement of the Sustainable Development Goals would be significantly facilitated by the State party establishing independent mechanisms to monitor progress and by treating beneficiaries of public programmes as rights holders who can claim entitlements. Moreover, the Committee recommends that the State party support the global commitment of the decade of action to achieve the Sustainable Development Goals. Implementing the Goals on the basis of the principles of participation, accountability and non-discrimination would ensure that no one is left behind. In this regard, the Committee draws the State party's attention to its statement on the pledge to leave no one behind.

72. The Committee requests that the State party disseminate the present concluding observations widely at all levels of society, including at the national and municipal levels, in particular among parliamentarians, public officials and judicial authorities, and that it inform the Committee in its next periodic report about the steps taken to implement them. The Committee emphasizes the crucial role that Parliament plays in implementing the present concluding observations and encourages the State party to ensure its involvement in future reporting and follow-up procedures. The Committee encourages the State party to engage with non-governmental organizations and other members of civil society in the follow-up to the present concluding observations and in the process of consultation at the national level prior to the submission of its next periodic report.

73. In accordance with the procedure on follow-up to concluding observations adopted by the Committee, the State party is requested to provide, within 24 months of the adoption of the present concluding observations, information on the implementation of the recommendations contained in paragraphs 15 (business and human rights), 19 (climate change) and 29 (discrimination) above.

74. The Committee requests the State party to submit its seventh periodic report in accordance with article 16 of the Covenant by 31 October 2027, unless otherwise notified as a result of a change in the review cycle. In accordance with General Assembly resolution 68/268, the word limit for the report is 21,200 words.