

Dear Sir/Madam,

I write in relation to the Department of Enterprise, Trade and Employment's request for views on the Proposal for a directive of the European Parliament and of the Council on adequate minimum wages in the European Union.

As an affiliate union of ICTU, UNISON fully endorses the response submitted by Congress to this consultation exercise. We would ask however that you account for our submission separately when analysing response to this consultation.

In addition to the submission made by Congress, UNISON as an affiliate trade union solely organising workers in Northern Ireland, would also wish to highlight the importance of the Irish Government supporting this draft directive, with amendments as proposed by ICTU, in the context of the commitments made in the Protocol on Ireland-Northern Ireland within the EU-UK Withdrawal Agreement.

UNISON, ICTU and a range of civic society groups across the entire island of Ireland, North and South, have long been extremely concerned by the impact that Brexit is having on the protection of the rights and equality provisions in the Good Friday Agreement, because European law has long been a critically important support for such rights. Provision exists within the Protocol that guarantees that there will be no diminution of such rights as a result of Brexit.

Despite these protections, we remain concerned that rights and equality protections for workers in Northern Ireland are open to being eroded over time. The EU – UK Trade and Cooperation Agreement contains only weak commitments on the 'level playing field' that do not require future dynamic alignment on worker's rights and open up the potential for further divergence from existing standards. UNISON is continuing to seek that the Northern Ireland Executive, which has devolved powers over worker's rights and equality laws, use its powers to enhance and protect worker's rights post-Brexit.

In our view it is vitally important that the Irish Government supports progressive legislation at the European Union level on the minimum wage, and further seek that such an approach be adopted in Northern Ireland, so as to ensure that workers' have equivalent rights across the island as envisaged by both the Protocol and Good Friday Agreement. To not do so would send a signal towards those who would seek to de-regulate within Northern Ireland and erode important protections for workers.

On that basis we would urge the Department of Enterprise, Trade and Employment to reconsider its' previously stated position in favour of a recommendation rather than an EU Directive and support the submission made by ICTU.

Yours sincerely

**PATRICIA McKEOWN**  
**Regional Secretary**

John Patrick Clayton  
Policy Officer  
UNISON Northern Ireland