



### **RECENT TRENDS CONCERNING THE AREA OF FREEDOM, SECURITY AND JUSTICE: THE NON EU CITIZEN'S LEGAL CONDITION SUFFERING FROM SERIOUS ILLNESS SEARCHING FOR SUBSIDIARY PROTECTION BETWEEN SUBSTANTIVE GROUNDS AND PROCEDURES**

After an introduction to the main legal features of the Area of Freedom, Security and Justice as set in the Lisbon treaty, this contribution aims at making some comments on the European Court of Justice rulings concerning two third country nationals asking for subsidiary protection. Critical comments are given on the Court's approach to legal meaning of both directives n. 2004/83 (the so-called "Qualification Directive"), and the directive n. 2008/115 ("Returns Directive").