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Re: *Submission related to the Draft General Comment No. 2 on article 9*

Dear Members of the Committee on the Rights of Persons with Disabilities,

The Human Rights Implementation Centre (HRIC) of the University of Bristol welcomes the efforts of the Committee on the Rights of Persons with Disabilities (CRPD) to formulate its second General Comment on Article 9 and is grateful for the opportunity given to all the stakeholders to provide feedback on the draft of this General Comment.

The HRIC would like to draw the attention of the CRPD specifically to the following issue:

- **The role of national bodies mentioned in Article 33**

The HRIC has also made a submission regarding the draft General Comment No 1 on Article 12 and there we welcomed the approach of the CRPD to devote the last section of that General Comment (paras 46-47) to the issues of national implementation. We believe it is paramount that States parties are given concrete and practical advice on the steps to be taken at the respective national levels on ways to implement the provisions of the Convention. The HRIC would like to invite the CRPD to include a similar section on the implementation at the national levels also in its second General Comment (and any subsequent General Comments that the CRPD may elaborate in the future).

The HRIC also would like to invite the CRPD to emphasize explicitly the role of the national bodies that States parties must establish in accordance with Article 33 of the Convention in the process of national implementation. By taking such an approach the CRPD would not only remind those States parties who have not yet complied with the obligations under Article 33 but also give support to those national bodies which have been established. The practice of other UN treaty bodies, such as the Subcommittee on Prevention of Torture and National Preventive Mechanisms under the Optional Protocol to the UN Convention against Torture, indicate that these national bodies can become crucial partners in supporting the work of the UN body. Conversely, to achieve this, the national bodies need to be provided with guidance, advice, and support which the UN body can provide. The HRIC would like to submit that General Comments provide a ripe opportunity for the CRPD to engage with these national bodies on the implementation of substantive issues of the Convention.

Consequently the HRIC respectfully would like to suggest the wording along the following lines to be included in the final section of the General Comment:

‘Article 33 requires that States parties have established focal points within their governments for matters relating to the implementation of the Convention as well as national frameworks which include one or more independent mechanisms. Civil society should also be involved and participate fully in the monitoring process. It is crucial that these Article 33 bodies are duly consulted when measures for proper implementation of Article 9 are considered. They should be provided with meaningful opportunities to, *inter alia*, take part in the drafting of national accessibility standards, comment on existing and draft legislation, submit proposals for draft legislation and policy regulation, and participate fully in awareness raising and educational campaigns’.

The HRIC remains at your disposal if there is anything we can assist with in your important work.

Sincerely yours,

Human Rights Implementation Centre