The content of the draft is, in my view, excellent, particularly the differentiated treatment of violence and its consequences. From the point of view of the Convention on the Rights of Persons with Disabilities, however, I would suggest to make amendments to paragraphs 27, 28 and 80-84.

Assemblies of persons with disabilities may need particular attention from the authorities. Protective interventions from the security forces against disruption of an assembly by third parties, such as the use of tear-gas against violent counter-demonstrators, for example, may have serious ancillary effects on persons with disabilities who participate in the assembly. Persons with psychosocial or intellectual disabilities may be profoundly affected by the side-effects such measures may have on them, and persons with mobility impairments may be particularly vulnerable to them. It is imperative that the security forces adapt their tactics and particularly their use of force accordingly. This should be reflected in para. 27.

There is no reason not to include persons with disabilities in para. 28. The particular vulnerability of persons with disabilities who assemble in public may raise issues with regard to maintaining security, as, for example, additional protective measures might be necessary. Such heightened concerns must not serve as grounds for denying a permit for an assembly or for other measures that negatively impact the right to assembly.

Notification and authorization regimes (para. 80-84) need to be accessible to persons with disabilities. The preparation of assemblies with a considerable impact on others often requires close interaction with the security forces, in which the particular route of a demonstration and other issues are being specified. Such interaction needs to be accessible to persons with disabilities. Accessibility pertains not solely to physical accessibility of the premises where the interaction takes place, but also to, among others, sign language translation, providing documents in Braille, Easy Read or other formats.

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