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Mr. Jorge Araya

Secretary of the Committee

Committee on the Rights of Persons with Disabilities

Office of the High Commissioner of Human Rights

Palais Wilson, 52 rue des Pâquis

CH-1201 Geneva, Switzerland

30 June 2017

Dear Mr. Araya,

Please find attached the submission to the CRPD Committee on the Draft General Comment on Article 19: Living Independently and Being Included in the Community by the **International Disability and Development Consortium** **(IDDC)**.

The IDDC is a global consortium of 28 disability and development NGOs, mainstream development NGOs, and DPOs supporting disability and development work in more than 100 countries to promote human rights and inclusive development internationally. This document reflects the experience and expertise from IDDC members.

The right to live independently and to be included in the community is central and deeply connected to IDDC’s and its members’ priorities. We welcome the Committee’s commitment to addressing this right and its steps towards spelling out State obligations in a General Comment. This submission intends to build on the strengths of the Committee’s draft GC and provide specific advice to strengthen standards for Article 19.

In summary, this submission focuses on the following core issues:

1. The need to expressly define, clarify and emphasise the right as it applies **‘on an equal basis with others’** **or ‘choices equal with others’**
2. Greater clarity between **progressive and immediate obligations** which is consistent in international law, particularly concerning ‘core elements’ or minimum core obligations and retrogressive measures
3. The need for more illustrative **examples on disability specific services** under Article 19 (b) and the need to outline an AAAA framework for disability specific services
4. The need for **greater consistency on the interrelated and essential features** of Article 19 (c) with the ICESCR, namely the AAAA framework, which could also be applied to Article 19 (b)
5. The need to define **institutionalisation** clearly and greater emphasis on **guidance to States** **transitioning from models of institutionalisation**, including ramifications if institutions close without alternatives in place
6. Increased alignment with CRC General Comment 9 **standards on deinstitutionalisation of children with disabilities**
7. The need to outline a **standard on ensuring a sufficient number of qualified specialists** for disability specific services

Should you require any additional information, please do not hesitate to contact me as the IDDC representative at bailey.grey@senseinternational.org.uk or +44 (0) 20 7014 9370.

Sincerely yours,

Bailey Grey

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