
Urgent civil society written submission for COSP19 — CRPD Article 13 General Comment request — IAJ

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Dear COSP19 Secretariat, Programme on Disability, Special Rapporteur Hagrass, CRPD Committee Secretariat, and COSP19 Bureau,

The Institute for the Advancement of Justice & Human Rights (IAJ) submits the attached written statement as an urgent civil society submission for consideration during COSP19, now in session.

The submission makes one central request: that the CRPD Committee initiate work toward a General Comment on Article 13 (access to justice in legal proceedings), which, after twenty years of the CRPD and eight General Comments on other articles, remains without dedicated authoritative guidance.

The IAJ's investigative record documents four recurring failure patterns that existing guidance does not address: accommodation granted in form and stripped in function; oscillating grants and denials of materially indistinguishable requests on unchanged records; non-concurrent accommodation across active forums; and complete merits foreclosure, where no forum adjudicates the accommodation claim on the merits. Each pattern is defensible at the level of individual procedural discretion while being indefensible as a systemic outcome. A General Comment is the appropriate next instrument for establishing the standard against which Article 13 implementation should be measured.

The IAJ respectfully requests: (1) that this submission be shared with the COSP19 Bureau, the CRPD Committee Secretariat, and the Office of SR Hagrass; (2) acknowledgment of receipt; and (3) the opportunity for post-COSP follow-up dialogue on Article 13 implementation in civil litigation settings. The IAJ's analytical publication, *Harmonizing the Architecture of Disability Rights* (Third

Edition, May 2026), documents this record in full. A short background summary is available immediately by return email.

In December 2024, formal communications regarding the documented five-victim case record were submitted to SR Quinn (disability rights), SR Edwards (torture/CIDT), and SR Satterthwaite (judicial independence), and remain on file with the OHCHR. The IAJ, which began operations on August 4, 2025, has adopted those submissions as part of its institutional record and continues the engagements they initiated.

Institute for the Advancement of Justice & Human Rights

Submitted during COSP19, June 10, 2026

Email to COSP19 re CRPD Article 13 General Comment Development

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