



Brussels, 25 September 2018

Dear Ms. Rurka,

We are writing you regarding the consultation on the merits of the "Draft Additional Protocol concerning the protection of human rights and dignity of persons with mental disorder with regard to involuntary placement and involuntary treatment" that was recently sent out to members of the Conference of INGOs.

Commenté [DV1]: Je ne connais pas le contexte de cette interpellation

We are surprised and concerned that the Council of Europe still considers the drafting of a document that is in violation of the United Nations Convention on the Rights of Persons with Disabilities, as expressed by many stakeholders, among which the [UN Committee on the Rights of Persons with Disabilities](#), the [UN Special Rapporteurs on Disability and Health](#) and the [UN Working Group on Arbitrary Detention](#), and even the [Council of Europe's Parliamentary Assembly](#) and [Commissioner for Human Rights](#).

In addition, and as you might be aware, several members of the Conference of INGOs including [organizations promoting the rights of people with disabilities](#) and [human rights organizations](#), have repeatedly spoken out against the draft Additional Protocol asking for its withdrawal. After several attempts to be heard, in May 2018 an [open letter](#) was sent to the Members of the Committee on Bioethics of the Council of Europe expressing our opposition to the Protocol and our disappointment regarding the lack of **meaningful** consultation with civil society, and more particularly with representative organisations of persons with disabilities, including persons with psychosocial disabilities.

We find it unacceptable that those organizations with a direct interest in the topic **have never been meaningfully consulted and that inputs have been systematically ignored.**

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Moreover, we regret that these concerns and strong opposition **have not been reflected** in the questionnaire and accompanying letter sent by the Conference of INGOs. We also take this opportunity to recall that as the purpose and spirit of the draft Additional Protocol blatantly violate the UN CRPD, we call for its **withdrawal**. We would have welcomed the questionnaire not only to focus on the content of the draft, but also to allow to express such opposition.

As President of the Conference of INGOs, we hope you will duly take our opinion into account and that together we can shift the work of the Council of Europe towards developing alternatives to forced treatment and institutionalisation, rather than regulating them.

We remain at your disposal would you require any additional information and thank you in advance for your consideration,

Autism Europe
European Disability Forum
Inclusion Europe
Mental Health Europe

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