

*Legal Seat – Helsinki, Finland*

**WORLD FEDERATION OF THE DEAF**

An International Non-Governmental Organisation in official liaison with ECOSOC, UNESCO, ILO,

WHO and the Council of Europe. WFD was established in Rome in 1951.

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**Submission on the Draft General Comment No. 5**

The World Federation of the Deaf (WFD) welcomes the initiative of the Committee on the Rights of Persons with Disabilities (CRPD Committee) to prepare general comment on article 19 of the Convention on the Rights of Persons with Disabilities (CRPD). The WFD would like to bring the following issues to the attention of the CRPD Committee when drafting the general comment further:

* **Paragraph 8:** The list of categories in the last sentence should include language.
* **Paragraph 29:** Remove the word “might” in the sentence: “In addition to personal assistance, these services might include…” The word can be misconstrued as possibly but not necessarily which is best avoided.
* **Paragraphs 29 and 91:** It would be important to emphasize professionalism of sign language interpreters (meaning training, accreditation and continuous development of skills etc.). Therefore the word professional could be added before word sign language interpreter in each paragraph.
* **Paragraph 58:** Add “linguistic” in the list of identities.
* **Paragraph 74:** “Teenagers may prefer personal assistance or professional sign language interpreters to informal support provided by relatives” (underlined to be added). Professional sign language interpreters are not seen as a type of personal assistance so it is important to add it in the sentence.

If you have any question, please do not hesitate to contact WFD Human Rights Officer Ms Eeva Tupi at [eeva.tupi@wfd.fi](mailto:eeva.tupi@wfd.fi)

***About the World Federation of the Deaf***

*The World Federation of the Deaf (WFD) is an international non-governmental organisation representing and promoting approximately 70 million deaf people's human rights worldwide. The WFD is a federation of deaf organisations from 134 nations; its mission is to promote the human rights of deaf people and full, quality and equal access to all spheres of life, including self-determination, sign language, education, employment and community life. WFD has a consultative status in the United Nations and is a founding member of International Disability Alliance (IDA). (*[*www.wfdeaf.org*](http://www.wfdeaf.org)*) Email:* [info@wfd.fi](mailto:info@wfd.fi)