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Sent by email [otp.informationdesk@icc-cpi.int](mailto:otp.informationdesk@icc-cpi.int)

OTP-CR-178/11

International Criminal Court

Office of the Prosecutor

Communications

Post Office Box 19519

2500 CM The Hague

The Netherlands.

Dear Sirs,

**ICC Reference OTP-CR-178/11: Crimes against humanity and genocide by the Government of New Zealand towards people with Down syndrome**

Further to our letter dated 4 October 2011, please find attached a supplementary submission to our original submission (our letter dated 29 June 2011). We have provided additional evidence in support of our case and clarification of the following areas of our submission:

- An overview of our core arguments (Part I);
- Additional arguments establishing that the group identified in the NZ Programme by the presence of ‘Down syndrome and other conditions’ is a protected group under the Genocide Convention (Part II);
- Additional arguments establishing that “Imposing measures intended to prevent birth within the group” includes both “direct” and “indirect” pressure (Part III);
- Evidence that "encouraging" abortion can be an effective measure intended to prevent births within the group; the measures need not be restricted to "compelling" abortions (Part IV).
- Why genocidal intention may be served by “imposing measures” and/or “facilitating measures” (Part V); and
- Conclusion (Part VI).

Also attached is a copy of the letter from the New Zealand Human Rights Commission dated 1<sup>st</sup> March 2011, that is referenced in Part I (3) of our supplementary submission.

Yours Sincerely,



Mike Sullivan  
Group spokesman for submitters