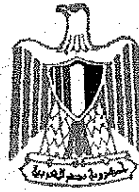


*Permanent Mission of the Arab Republic of Egypt  
to the United Nations Office, the World Trade  
Organization & International Organizations  
in Geneva*



البعثة الدائمة لجمهورية مصر العربية  
لدى الأمم المتحدة، ومنظمة التجارة العالمية  
والمنظمات الدولية  
في جنيف

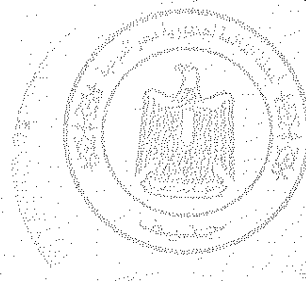
CHAN.2019. 231

The Permanent Mission of the Arab Republic of Egypt to the United Nations, the World Trade Organization, and Other International Organizations in Geneva presents its compliments to the Office of the High Commissioner for Human Rights, and with reference to OHCHR's circular note dated 29 August 2019 concerning the request addressed to the States from the OHCHR regarding the annual full-day meeting on the rights of the child (2020) on the theme "**Realizing children's rights through a healthy environment**", has the honor to attach herewith a submission by the Government of the Arab Republic of Egypt concerning the aforementioned request.

The Permanent Mission of the Arab Republic of Egypt to the United Nations, the World Trade Organization, and Other International Organizations in Geneva avails itself of this opportunity to renew to the Office of the High Commissioner for Human Rights, the assurances of its highest consideration.

Geneva, 19 September 2019

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**Office of the High Commissioner for Human Rights**  
Fax: +41-22 917 90 08

## "Realizing children's rights through a healthy environment"

1. Please share any information or evidence on the impact of environmental degradation, pollution or childhood exposure to hazardous substances on children's rights, including the right to health.

### - Solid particles less than 2.5 micrometers PM2.5:

A) Particulate matters less than 2.5 micrometers PM2.5 are produced from fuel combustion in car engines, power plants, factories, and it is considered one of the most dangerous pollutants on health of the citizens, especially children and patients with asthma and respiratory problems, where it affects negatively the performance of the lungs causing the feeling of difficulty of breath, which also affects negatively the overall performance of the human being as a result of being subjected to frequent infections of the lungs and it causes respiratory tract immunity deficiency, and the chronic asthma and premature aging of the lungs

B) Monitoring processes have been activated in the major areas in Greater Cairo to include broader coverage for monitoring, in order to determine the extent of vulnerability in the rates of concentrations of particulate solid matters that do not exceed a diameter of 2.5 micrometers PM2.5, and analysis of monitoring data and studies comparing the maximum average annual allowable in accordance with the executive regulations of law No. 4 of 1994 as amended by Law 9 of 2009, it was (50 micrograms / m<sup>3</sup> / year), and it was found that it exceeded the permissible limits which is considered very dangerous on the health of citizens.

\* By comparing the annual average concentrations in Greater Cairo in 2012 it was found (94 micrograms / m<sup>3</sup>) which exceeded the maximum annual average allowed by law (50 micrograms / m<sup>3</sup>) it was clear and there are increase by approximately 88%.

\* By Comparing the annual average concentrations with the base year 1999 (78 micrograms / m<sup>3</sup>), it was found that there was an increase in the annual average concentrations for 2012 (94 micrograms / m<sup>3</sup>) of the particles of solid-diameter less than 2.5 micrometers of almost 20%, and compared to the average annual for 2011 it showed a decrease as much as 27%. This was attributed to increase of the number of vehicles per year dramatically from 1999 until 2012 without taking strict measures to check the vehicles without scrapping the old vehicles, especially heavy transport service and the lack of legislation to do so.

- Climate change is affecting directly and indirectly Citizens' health. The most vulnerable people for these impacts are children, women, elder people and the poorest sectors as well as rural areas as they represent 58% of Egypt's population. Health consequences arising from climate change will increase heavily in Egypt leading to the absence of justice and quality in Health care, the divergence in getting medical services, the need of medicine and the spread of infectious and chronic diseases which will be more difficult in the most fragile

sectors. One of the direct Healthy impacts related to climate change is the increase in diseases of high temperature such as: sun shock, skin cancer and cataract, whereas the indirect impacts are represented in water shortage, agricultural productivity shortage leading to food shortage and appearance of Anemia and malnutrition diseases, in addition to change in water and air quality. In this regard, there are scenarios and predications threaten Egypt with water availability lack that affects health sector. Also, one of the indirect healthy impacts of climate change are diseases related to parasites and pests which high temperature help in their dissemination. However, little researches and studies are conducted in the field of climate change impacts on Hygiene due to the unavailability of adequate data and information. Moreover, the sudden heavy climatic incidents represented in floods, storms and rainfalls lead to several injuries and compulsory immigration accompanied by food and pure water shortage as well as increase of affection rates with diseases.

The studies indicate that the high noise levels affect the citizens health and cause many diseases, not only its impact on the ability of hearing but also it causes a series of health problems, including hypertension, peptic ulcers, muscles spasm, sleeping disturbances and the incidence of neurological and psychological disorders as well as its impact on children and their learning ability and it is clear in children living close to sources of noise, like airport.<sup>1</sup>

2. Please identify noteworthy and globally significant examples of good practice towards ensuring children's rights through a healthy environment, including good practices to mitigate childhood exposures to harmful levels of air pollution and hazardous substances, such as pesticides or other toxic chemicals.

The National Council for Childhood & Motherhood (NCCM) implemented "Improving the Standard of Living of Children" project: Under this project, 710 children from poorer families received a full education grant to help reduce dropping out of school levels and 163 mothers are assisted in obtaining a national number card. Other activities include a survey of families lacking electricity and coordination with the Ministry of Electricity to link families to the national grid, and the construction of a sanitary disposal network with the help of the Greater Cairo Water Company. NCCM, also, organized a number of awareness-raising seminars for families and children on the safe sanitary disposal of human waste ran mobile trachoma clinics with the participation of 400 parents, provided 136 pairs of prescription glasses and helped provide medicine and surgical interventions.

The "Enhancing Access of Children to Education and Fighting Child Labour (2014-2018)", is a project funded by the EU and implemented by WFP to provide food security for up to 100,000 children at risk of child labour, and financial assistance to 400,000 family members to compensate for wages that child labour would have otherwise generated, enabling children to attend school. Support 50,000 households in income-generating activities

<sup>1</sup> Egypt State of Environment report (2012), Ministry of State for Environmental Affairs, issued in 2015.

- to help keep their children in school. By the end of 2016, the project reached 13.3 million students in 16 governorates.
- Expanding Access to Education and Protection for at Risk Children in Egypt (2016-2021) is a project funded by EU and implemented by UNICEF in cooperation with the Ministry of Education and NCCM to expand access to education for 36,000 children, including 6,000 children with disabilities, and to support 15 Child Protection Committees in 15 governorates.
  - Takaful and Karama Initiative of the Cash Transfer Program (2015-2017) is funded by the government of Egypt and provides a monthly income supplement to poor families, conditional on keeping their children at school or unconditional for the elderly and family members with disabilities. The initiative reached around 1.5 million households until 2017.
  - The Ministry of State for Environmental Affairs has set up a unit to oversee conditions in shanty towns to reverse the deteriorating conditions and build the capacities of civil society organizations active in these areas. The unit also provides training on the implementation of environmental projects and encourages volunteering among youth. In spite of the strict regulations imposed by the Ministry on industrial activities, environmental pollution remains one of the main hazards affecting children's health. Measures taken so far have failed to improve the quality of air all year round with air pollution levels reaching unacceptable proportions with the open burning of rice husk.<sup>2</sup>
  - Continuing the development of the central nursery and the Child garden affiliated to Egyptian Environmental Affairs Agency (EEAA) as the central nursery is always a source for the production of trees, shrubs and plants shade and it is used for environmental support of schools, units of the Central Security, public hospitals, mosques, monasteries and NGOs, and the Child garden is an environment and health outlet for the people of New Cairo area. The ministry has provided support for the establishment of a nursery in EEAA regional branches in New Valley, Fayoum and Alexandria, in activation of Article 27 of law no 4 of 1994 that stipulates on the necessity to establish a nursery in every village and governorate.
  - Increasing the environmental awareness for children about the "E-waste" was added to the simplified scientific guidelines (definition - resources - uses) in Bezra magazine, published by Ministry of State for Environmental Affairs.
  - Preparing some questions and answers about the "mercury and its health and environmental impacts", "how to get rid of fluorescent lamps," in Bezra magazine so as to raise environmental awareness among children.
  - Supporting the international conference for childhood and youth entitled "let's take care of our planet".<sup>3</sup>
  - Positive Life Alternative for Egyptian Youth at -Risk of Irregular Migration Programme (2015-2017) is a USAID funded project implemented by IOM to support the activities that include the goal of eliminating the worst forms of child labour, specifically through raising awareness among children and

<sup>2</sup> Egypt 3<sup>rd</sup> & 4<sup>th</sup> report submitted to the Committee on the Rights of the Child (CRC)

<sup>3</sup> Egypt State of Environment report (2012), Ministry of State for Environmental Affairs, Issued in 2015

youth on the dangers of irregular migration and trafficking in persons, and building technical capacity of service providers for at – risk children. In 2016, the project held a workshop and study tour for 28 Government officials and community leaders in advance of a campaign to raise awareness about the risk of irregular migration and increase prosecutions and convictions of traffickers.

- Shelters for Children: Shelters are operated by the Ministry of Social Solidarity for victims of trafficking, Dar El Salam operated by NCCM and FACE, for a variety of project participants, including child victims of trafficking and forced labour. Dar El Salam provides social services, including psychological counselling and health services. In 2016, just under 5.600 children benefitted from Dar El Salam services.<sup>4</sup>

3. What legal and other measures are in place to ensure that the activities of companies do not damage the environment, either domestically or in other countries? What are the main gaps and challenges experienced in this regard?

#### Legal Context:

- Law 105 for 2015, Law for the Protection of the Environment 105 for 2015 Amended by Law 9/2009.

#### Challenges:

- The percentage of carbon dioxide emissions in Egypt reached about 141.1% in 2010 in comparison with the percentage in 1990, which amounted to 75.5 million tons. The most important factors and reasons of chemical fertilizers pollution are crop intensification, rainfall rate and irrigation, bacteria and microorganisms. As for the environmental damage of pesticide, most of them comes from slow decomposition annular compounds and some of them contain heavy elements with a high degree of toxicity to plant, the increase in the outputs of breakage increases the concentration and the accumulation of large quantities of the chlorine, phosphorus and nitrates elements above the allowable limit in the agricultural environment which affects animals or humans. Irrigation water is an indirect source to agricultural soil pollution as this comes from the re-use of agricultural drainage water or draining sewage and industrial water into water surface and waterways used in irrigating agricultural land which in turn contain heavy toxic metals, fertilizers and chemical pesticides that have an impact in agricultural soil pollution. It is clear from the above the importance of the environmental safety principle which means seeking to maintain the integrity and nature balance through applying the principle of natural pest captivity and not focusing on chemical pesticides, the most important way to protect environment from pollution is organic farming.

<sup>4</sup> Bureau of International Labor Affairs, 2016 findings on the worst forms of child labour, [https://www.dol.gov/sites/dolgov/files/ILAB/child\\_labor\\_reports/tda2016/Egypt2016Report.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2016/Egypt2016Report.pdf)

- Local community empowerment-conserved areas are increasingly recognized as legitimate and powerful tools for biodiversity conservation and sustainable use. In Egypt, none of the existing protected areas is being managed by local communities. Although local communities are not excluded from protected areas, their role in safeguarding biodiversity remains a challenge to real progress. However, the linkages between poverty alleviation and well-functioning ecosystems is emphasized at the local and community level, where the impacts are felt, as well as at a national level where important decisions about economic growth and development are made. Local communities are encouraged to actively participate through partnership arrangements as in the case of the medicinal plants project. A number of important poverty alleviation and community development programs have been initiated, and presented opportunity for improving natural resource management and employment for the poor and linking biodiversity and social development.
- Although public sector funding and bilateral/multilateral assistance will certainly continue to be important funding sources, new and innovative financial mechanisms are required to fill existing and future funding gaps. Financial sustainability is a critical requirement of the effective protected area networks envisaged by Aichi Target 11.
- Air pollution is considered one of the major challenges facing Egyptian society. the Ministry of State for Environmental Affairs put these issues on the top of its priorities, and gave extraordinary attention to execute the strategies that face air pollution relatively with economic growth in addition to industrial, and other development processes.
- Protection of water resources from pollution is a real challenge facing Egypt in the early twenty-first century. Pollution due to untreated wastewater effluents, industrial water effluents and agricultural drainage water are considered the main threats to water quality in Egypt.<sup>5</sup>

**4. Please provide information on national laws and policies to ensure the companies undertake environmental and human rights due diligence and do not contribute to abuse of children's rights?**

- Article 80 of the 2014 Constitution defines persons under the age of 18 as children and protects their rights, in particular their right to a name, identity documents, free compulsory vaccination, health care, family or alternative care, basic nutrition, safe shelter, emotional and cognitive development and education, also for children with disabilities. It contains provisions for the care and protection of children from all forms of violence, abuse, mistreatment and commercial and sexual exploitation, and establishes a special judicial regime for child victims. These rights and freedoms were absent from earlier Egyptian constitutions.
- Article "89" of the Constitution: "All forms of slavery, oppression, forced exploitation of human beings, sex trade, and other forms of human trafficking are prohibited and criminalized by Law".

<sup>5</sup> Egypt State of Environment report (2012), Ministry of State for Environmental Affairs, issued in 2015.

- Child Law no. 12 / 1996 amended by the law no. 126 for 2008.
- The Unified Labour Code No. 12 of 2003
- Article 2-3 of the law no.64/ 2010 on Combating Human Trafficking.
- Act No. 23 of 2012 which introduces a health Insurance system for single women;
- Act No. 86 of 2012 which regulates health insurance for children under school age;
- Article "1-2" of Ministry of Manpower's Decree 118.
- Second National Plan of Action Against the Worst Forms of Child labour.
- Third National Plan of Action Against Human Trafficking (2016-2021).
- Egyptian Biodiversity Strategy.
- National Strategy for Environmental Communication (NSEC).
- National Strategy for Cleaner Production in Egyptian Industry.
- Towards a National Strategy for Sustainable Development.
- National Environmental Action Plan 2002 – 2017.
- Implementation of the Stockholm Convention National Implementation Plan – Egypt.<sup>6</sup>

\* What measures are in place to combat hazardous forms of child labour in which children are at particular risk of exposure to hazardous and toxic substances?

Different steps have been taken to combat child labour and its worst forms at different level:

- Establishment of a new unit in the Ministry of Manpower's premises, under the name of "Child Care unit" (currently referred to as "Child Labour Inspection Unit"), by virtue of ministerial decree No. 169 for the year 2001.
- Child care units have been established under the Manpower directorates, similar to the unit established in the Ministry's premises to implement its policy in the field of child labourers' care and protection on every directorate's level, by virtue of the ministerial decree no. 180 for the year 2001, amended by ministerial decree no. 125 for the year 1996.
- Establishment of a new general department under the name of the General Department for Woman and Child's Affairs with an affiliated specialized department for children and juveniles' labour inspection, by virtue of the Ministry of Manpower's ministerial decree no. 47 for the year 2016, to be responsible for setting general policies, plans and programs that ensure protection of children and juvenile labourers from work hazards, accidents and occupational diseases. It will also work towards ensuring fair terms and conditions of work that would provide children and juvenile labourers with necessary protection and stability in the work environment, in addition to participating with other relevant authorities concerned in setting up general policies, plans and programs which ensure elimination of child labour.
- Ministry of Manpower's decree no. 118 for the year 2003 has been issued and stipulates, in its first article, that children less than 18 years old shall not be employed in several occupations and industries including "quarries, cotton pressing, processing, manufacturing and application of pesticides".

<sup>6</sup> <http://www.eaaa.gov.eg/en-us/mediacenter/reports/plansstrategies.aspx>

- National Council for Childhood and Motherhood (NCCM) has set a strategy on child labour in 2006 aimed at developing preventive, curative and rehabilitative programs, and to amend or change policies and legislations. The strategy is implemented in collaboration with the relevant ministries, 23 NGOs, business men and international partners.
- Establishment of Community schools as per the Ministry of Education's decree no.30 to enable children to catch up with those of the formal school system, but at a pace that matches their capabilities, to prevent them from dropping out of school completely and to return children to some form of education.
- Establishment of Child Protection Committees in the 26 governorates, under the supervision of NCCM, representing a coordination mechanism as per the Child Law.
- Issuance of the Ministry of Manpower's ministerial decrees No. 175 for the year of 2003 on apprenticeship through which the Ministry was able to withdraw, from the labour market, a number of children dropouts and organize vocational training courses. The Egyptian legislator has established a legal system for what is referred to as "apprenticeship agreement" for the age group (12-18 years old), directing the will of both parties of the agreement to the child's acquisition of a profession or an occupation.
- Issuance of the Ministry of Manpower's ministerial decrees No. 227 for the year 2009 on the formation of a tripartite steering committee to develop a national action plan for the elimination of child labour.
- Issuance of ministerial decrees No. 237 for the year 2014 on formation of a tripartite steering committee to develop the draft national plan for combating the worst forms of child labour.
- Adoption of the Strategic Framework and National Plan for Childhood and Motherhood (2018-2030) in March 2018 while allocating a complete section tackling combating child labour as a priority topic.<sup>7</sup>
- The Ministry of Social Solidarity began operating 17 mobile units, providing services to over 4,000 street-based children.
- The National Coordination Committee on Preventing Illegal Migration and Combating Trafficking in Persons provided training to media professionals on reporting on human trafficking and victim protection.
- Social media messaging on irregular migration and human trafficking produced by the same Committee reached one million individuals.
- The National Council for Childhood and Motherhood conducted 35 awareness-raising campaigns.<sup>8</sup>

<sup>7</sup> National Action Plan for Combating the Worst Forms of Child Labour in Egypt and Supporting Family (2018 – 2025).

<sup>8</sup> Bureau of International Labor Affairs, Child Labor and Forced Labor Reports, Egypt, <https://www.dol.gov/agencies/ilab/resources/reports/child-labor/egypt>



5. What measures are in place to fulfil children's right to participate and be heard in decisions affecting their rights and environment, including their right to effective remedy in the case of violations of their rights linked to pollution or exposure to hazardous substances?

- NCCM launched in June 2005 an emergency telephone service, known as child helpline 16000. A monitoring instrument to the situation of children in Egypt, and a source for data on children advising policy development and interventions. During its 10 years of establishment, the CHL - provided for in article 97 of the child law No 12 of 1996, amended by law number 126 of 2008 - has gained legal status as one of the most important national children protection mechanisms. Through the helpline concrete steps were achieved to provide an effective umbrella to protect children from all violations and to ensure their rights provided by the law and international conventions, through linking each case with the appropriate services. NCCM has a major role in activating a national protection network for children through child protection general and sub-committees in the governorates. This network reinforces not only the principle of access to services to all children, but also the presence of effective community partners of the child helpline, which are able to quickly reach sources of dangers to which children are exposed.
- Childhood Protection Committees (CPCs): NCCM works to ensure the prevalence and quality of centralized and decentralized child protection mechanisms at all levels. These protection mechanisms are represented by CPCs which are technically supported by NCCM. In this regard, NCCM coordinates with the concerned organizations to provide urgent support to children through Child helpline 16000, through which all violations against child and mother rights are reported.
- In December 2016, NCCM launched "Awladna" (meaning Our Children) National Multimedia Campaign Promoting Positive Parenting. It was the first campaign of its kind on positive parenting, in partnership with the United Nations Children's Fund (UNICEF). The campaign was supported by the European Union (EU) in the context of the joint programme titled "Expanding Access to Education and Protection for at Risk Children in Egypt". The campaign comes as part of a holistic approach to support development of policies on protecting children from violence, and to raise public awareness on the issue of positive parenting by targeting parents, caregivers and parents-to-be. The multimedia campaign "Awladna" reached millions of parents and caregivers, through TV and Radio Public Service Announcements (PSAs), SMS transmission, and social media posts engaging some celebrities under the slogan #Calm Not Harm, as well as printed press, outdoor advertising, and direct public interaction.
- In 2018, Egypt launched the first national anti-bullying campaign against peer-to-peer violence. It was launched under the auspices of NCCM, in partnership with the Ministry of Education and Technical Education (MOETE) in cooperation with

- the United Nations Children's Fund (UNICEF) and funded by the European Union (EU).
- The Family and Child Rights programme (FCR) implemented by NCM and funded by the EU, implemented combating Child Marriage, trade marriage, and trafficking awareness campaign in Giza Governorate which was composed of the following:
    - \* 5 Marriage legislative seminars: the target beneficiaries were 175 attendees (lawyers, official leaders, teachers, community natural leaders, women who facilitate marriage "Khatba" and religious leaders). The objectives were to address the legal situation of child marriage even in cases that were not officially documented by Māzoon.
    - \* 20 awareness raising seminars attended by 1000 beneficiaries: the seminars beneficiaries were rural poor women and men and the theme of the seminars were child rights.
    - \* 20 Reproductive Rights seminars attended by 500 women between 20 - 39 years: the seminars beneficiaries were rural poor women the theme of the seminars was reproductive rights.

6. How are environmental risks to children being monitored and measured in your country?

- Environmental risks to children being monitored by:
  1. Labour Inspectors who monitor child labour in the informal sector.
  2. Child helpline 16000.
  3. Child Protection Committees.