**Comments from the Asia-Pacific Regional Network for Early Childhood (ARNEC)**

**Section: I. Introduction**

Paragraph 1: We should also highlight the compounding impacts from non-climatic hazards such as earthquakes, tsunamis, and volcanoes which make children more vulnerable.

Paragraph 3: These quotes are from older children who can express themselves verbally. Can we also include examples of the impact on the youngest/preschool children on the impact of climate change, e.g. excessive rains due to climate change curtails young children playing outdoors or school closure due to flood.

Paragraph 5: ARNEC recommends that the General Comment #26 references General Comment #7 to acknowledges the specific needs and opportunities of Early Childhood. Young children while being the most vulnerable, can also be the most valuable.

* Climate change highlights the importance of the nurturing care agenda (urgency to provide adequate resources to support existing programme which support young children and families)
* Early childhood policies and programmes yields the highest returns.
* Boosting the achievement of the sustainable development goals

**Section: I. Introduction – A. A child rights-based approach to the environment.**

Paragraph 8: When education is mentioned, it does not recognise ECE. **Early childhood education** – there is currently no explicit recognition of the ECE rights in international law, including in the CRC, which makes it challenging to mention ECE, but perhaps there is a way that it can be acknowledged as part of the education continuum in reference to the right to education (recognising that Human Rights Watch are leading an advocacy campaign on this issue of enshrining free pre-primary education in international law and they are calling for support of efforts to recognize a legally binding obligation that the right to education includes a right to early childhood education, and explicitly to guarantee all children the right to at least one year of free pre-primary education (and to free secondary education) consistent with the right to free primary education. They are trying to build support for a new optional protocol to the CRC).

Paragraph 8: Suggest including, … in particular for specific groups of children including children with disabilities, indigenous children, and children working and/or living in hazardous conditions.

**Section: II. Key Concepts - A. Sustainable development**

Paragraph 12: The term “developing” is outdated and it is preferable to use either least-developed countries (United Nation) or low-income countries (World Bank).

**Section: II. Key Concepts - B. Intergenerational equity and future generations**

Comment: When discussing on equity, we should be making a connection between climate justice and gender justice/gender equality.

**Section: III. Specific rights of the Convention as they relate to the environment - B. The right to the highest attainable standard of health**

Paragraph 24: Could we also consider transportation emissions that can result into severe air pollution in many countries? The use of inefficient and polluting fuels and technologies; land clearing for farming is also a significant environmental issue in the Asia-Pacific region.

**Section: III. Specific rights of the Convention as they relate to the environment - C. The right to Educations**

Paragraph 34: Consider including the integration of nature into preschool classroom and curriculum. (e.g. Materials from nature found in the environment can be brought into the classroom and made part of the curriculum.)

Paragraph 35: Governments should invest in the well-being and professional development of education professionals and ensure equitable pay.

**Section: III. Specific rights of the Convention as they relate to the environment - G. The right to non-discrimination**

Paragraph 50:Should we also consider children (if we follow the Convention on the Rights of the Child's definition of children as anyone under 18 years) with diverse SOGIE (sexual orientation, gender identity and expression) as one of the groups who face heightened barriers? These would also include children living in atypical families’ structures like incarcerated families, same sex parents, etc

**Sections: III. Specific rights of the Convention as they relate to the environment - I. The right of the child to be heard.**

Paragraph 57: Youngest children – although there is mention of age-appropriate mechanisms etc., there needs to be greater differentiation between ‘children’ – so that youngest children are highlighted, particularly in the first **1000 days** because of the importance of this window of development.  The distinction between young children, school aged children and youth should be made – to recognise differential impacts e.g. on children 0-8 in terms of both the impact of climate change/environmental hazards on their wellbeing and development and how investing in ECD can support climate adaptation and sustainable futures.

# Section: IV. The right to a clean, healthy and sustainable environment

Paragraph 73 (a): suggest including under five mortality (and morbidity)

Paragraph 73 (c): Suggest reviewing terminologies. Malnutrition refers to deficiencies, excesses, or imbalances in a person’s intake of energy and/or nutrients. The term malnutrition addresses 3 broad groups of conditions and undernutrition is one of them.

# Section: VI. General obligations of States

Comment: Is it possible to include much more explicitly issues relating to mental health and wellbeing. We are thinking in particular to the obligation of the state to create a social context (ie the social/cultural environment) that addresses prejudice, disadvantage, and the kinds of disadvantage that are associated with government policies and practices that exclude those who are disadvantaged, which in turn has a major flow-on negative impact on children.

**Section: VII: Climate Change. State obligations, implementation, and accountability**

Comment: There are a couple of mentions of accountability, but this could be strengthened, including to reference accountability around how views, voices and perspectives of children will be used and responded to.