**Comments of the Mannerheim League for Child Welfare, Finland**

**The Committee on the Rights of the Child**

**General comment on children's rights and the environment with a special focus on climate change**

It should be added to **para. 49** of the General comment that **children should receive support for dealing with climate anxiety**, as climate and environmental problems cause concern among children. Support should be provided in the child’s own language, taking into account the child’s own culture and environment. In the implementation of Finland’s National Child Strategy, the Ombudsman for children carried out a study on the realisation of the rights of Sámi children. One of the key results of the study was the strong relationship of Sámi children with nature and concern about the impacts of climate change on the northern nature.

**Para. 50** of the General comment discusses different vulnerable and vulnerable child groups. This para. **should also include children with mental health disorders** that may hamper or prevent children from enjoying their rights also in the environment. Children with mental health disorders are more prone to anxiety caused by climate change and other environmental problems than other children, in addition to which climate change and environmental problems have negative impacts on children’s mental health.

In **para. 57** of the General comment, **democracy education should be added alongside human rights education**. One of the objectives of democracy education is to strengthen young people’s participation in society and to increase their competences for democracy. In environmental issues and exertion of influence, it plays an important role in addition to human rights education.

**Para. 60** of the General comment. Bullying and hate speech have a significant impact on children’s and young people’s everyday wellbeing. These phenomena are increasingly intertwined with digital environments. Especially in online environments, **the responsibility of companies for hate speech experienced by children should also be highlighted in para 60 of the General comment**. The theme has also been discussed in the General comments 16 and 25 of the Committee on the Rights of the child.

**Para. 89** of the General comment. **It is excellent that the draft General comment highlights child impact assessment and its importance**. The draft emphasises the importance of ex ante impact assessment. However, **more emphasis should also be placed on the follow-up assessment of decisions**. The follow-up assessment is closely linked to the ex-ante evaluation. The ex-ante evaluation and the follow-up evaluation complement each other, which is also well reflected in the Committee on the Rights of the child’s General comment No. 5, para. 45 “…delivery at all levels of government demands a continuous process of child impact assessment (predicting the impact of any proposed law, policy or budgetary allocation which affects children and the enjoyment of their rights) and child impact evaluation (evaluating the actual impact of implementation)”.

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