

Suite No.2, Art Centre, 22 6th St, Parkhurst, Johannesburg, 2193

PO Box 1560, Parklands, 2121 | Tel: +27 11 78 1278 | Fax: + 27 11 788 1289

Email: info@mma.org.za | [www.mediamonitoringafrica.org](http://www.mediamonitoringafrica.org)

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**TO: COMMITTEE ON THE RIGHTS OF THE CHILD**

 E-mail:ohchr-crc@un.org

**SUBMISSION BY MEDIA MONITORING AFRICA:**

**GENERAL COMMENT ON DRAFT GENERAL COMMENT ON CHILDREN’S RIGHTS AND THE ENVIRONMENT WITH A SPECIAL FOCUS ON CLIMATE CHANGE**

For more information, please contact:

**William Bird, Director, Media Monitoring Africa**

Email: williamb@mma.org.za

Tel: +27 11 788 1278

**Thandi Smith, Head of Policy, Media Monitoring Africa**

Email: thandis@mma.org.za

Tel: +27 11 788 1278

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# **INTRODUCTION**

1. Media Monitoring Africa (MMA) welcomes the opportunity to provide this submission to the Committee on the Rights of the Child (the Committee) on the Draft General Comment on Children’s Rights and the Environment with a Special Focus on Climate Change (the Draft General Comment).
2. We note the importance of the Draft General Comment, in that it details the various ways in which the principles, rights and responsibilities of the Convention of the Rights of the Child (CRC) find application within the context of climate change. Furthermore, we are of the view that the Draft General Comment has the potential to mitigate and manage the environmental harms that will have adverse, direct, and indirect effects on children. This will enable children from diverse backgrounds and with varying capabilities to effectively realise their rights, as well as play a role in climate change mitigation and adaptation.
3. As a point of departure, we appreciate the Draft General Comment’s commentary on the nexus between children’s rights to access to information and climate change. In particular, we welcome the Committee’s acknowledgement of the importance of access to information. MMA generally supports the proposed positions adopted by the Committee and commends the efforts of the Committee to ensure that the children’s rights to access information are given context within the pressing challenges presented by climate change. However, MMA submits that there is a pressing need to recognise the role of access to information online, the dangers of climate disinformation, and the role of digital literacy, as important considerations for amplifying the intersection of access to information and climate change.
4. Our submissions are narrowly tailored and are structured as follows:
	1. **First**, we highlight the importance of access to information;
	2. **Second**, we address the danger of climate dis/misinformation;
	3. **Third**, we discuss the role of digital literacy.

# **OVERVIEW OF MEDIA MONITORING AFRICA**

1. MMA, established in 1993, is a not-for-profit organisation, based in South Africa, that has evolved from a pure monitoring-based project to an innovative organisation which implements successful media strategies for change. Since 2003 children’s rights have played a central role in MMA’s work, ranging from pioneering efforts in meaningful children’s participation to empowering children through media literacy workshops, providing editorial guidelines and principles for the reporting of children in the media, and making parliamentary submissions with and on behalf of children.[[1]](#footnote-2)
2. Most notably, we work directly with young digital citizens, Web Rangers, who are empowered to use the internet responsibly.[[2]](#footnote-3) The Web Rangers programme encourages the development of digital literacy skills that allow young people to gain critical skills and knowledge about online safety. In addition, the programme also equips young people with the skills to critically engage with content, learn how to spot disinformation, and develop methods on how to use the internet to build South Africa’s democracy. In 2022, the Article 12 Working Group was launched. This group is made up of Web Ranger Ambassadors who have been trained in digital literacy and have a special interest in policy work. Article 12 members engage with digital rights-related policy submissions and discussions to ensure that their voices are heard and opinions are considered by policymakers and industry leads. With the support of MMA, the Article 12 members drafted and prepared their own submissions to the Committee. These submissions are attached to MMA’s submissions. MMA supports the submissions made by the Article 12 members.[[3]](#footnote-4)

# **SUBMISSIONS ON THE DRAFT GENERAL COMMENT**

## Access to information in the context of the environment

1. For children to be environmental change makers, as the Draft General Comment aims to achieve,[[4]](#footnote-5) they must have access to information surrounding the causes, effects and solutions to climate change. MMA welcomes the commentary the Draft General Comment presents on children having the right to access information relating to climate change and environmental harms.[[5]](#footnote-6)
2. In General Comment 25, the Committee recognised that “[t]he rights of every child must be respected, protected and fulfilled in the digital environment”.[[6]](#footnote-7) The Committee further recognised that “the digital environment provides a unique opportunity for children to realize the right to access to information.”[[7]](#footnote-8) While access to information is fundamental in the fight against climate change, the challenges associated with certain content cannot be ignored. Content that is created and shared with the intention to deceive and harm, or content that is curated using algorithmic personalisation to amplify certain content to particular users to influence narratives, shape a child’s view, or generate profit, can cause significant harm to a child’s right to access information.[[8]](#footnote-9) This can jeopardise the important role children are and will continue to play in the fight for climate justice.
3. Platforms and social media sites curate content by using algorithmic personalisation to amplify certain content to particular users based on what platforms believe a given user would find relevant or interesting. By ensuring that a user is kept engaged by their social media feed, platforms can maximise profit through advertising.35 This poses significant concerns regarding the breadth, quality, and content of the curated information to which users are exposed. Individuals or networks of malicious actors can also contribute to the creation and dissemination of climate disinformation.
4. Recognising that the online world is becoming a natural part of many children’s lives,[[9]](#footnote-10) MMA recommends that further emphasis be placed on the intersection of access to information online and the children’s rights and responsibilities in the context of environmental justice and climate change.

## Access to all climate change information

1. The Draft Comment stipulates that children have the right to access all *relevant* information, and then goes on to list categories of what such relevant information includes.[[10]](#footnote-11) MMA welcomes the list provided and agrees that children should access information on these themes. However, MMA raises a slight caution on the use of the word “relevant”. Prescribing relevancy may be interpreted as a prerequisite to what information children have access to, implying that there is some authority, such as the state, an educator, parent, or caregiver, who decides what is relevant and what is not.
2. To the extent there are bad actors or states with harmful agendas, this has the potential to be misused. For example, here if an authority is dictating what information is shared with children and what is not, valuable information relating to climate change may be censored from children. If certain information is withheld from children, they will be unable to make informed decisions. The authorities in question will be able to shape children’s views and decisions based on a particular narrative or agenda.
3. It is trite that for children to make informed decisions, they must have access to the information related to that decision – this holds true for climate change.[[11]](#footnote-12) Access to information or content must be informed by considerations of the principle of the best interests of the child, as well as progressive understandings of the evolving capacity of children. For example, the content about climate change for children who are 5 years old will be very different to that of children who are 16 years old.
4. As the Draft General Comment itself seeks to empower children as agents of change, we submit that this potential for censorship is contrary to its own objectives. It is accordingly submitted that the wording of the abovementioned provision should be amended to provide children with the right to access all climate change-related information, based on the best inters of the child and their evolving capacities followed by the non‑exhaustive list.

## Adaptive and mitigation responses

1. MMA notes that the list of relevant information specifically includes adaptative responses, but not mitigation responses.
2. MMA understands that mitigation responses refer to actions that persons can take to reduce the number of greenhouse gases that get released into the atmosphere.[[12]](#footnote-13) Adaptive responses, on the other hand, refer to actions that one can take to adapt to life within a climate change context.[[13]](#footnote-14) Both measures are essential for an effective climate change response. This is envisaged by the primary international agreement relating to climate change, the Paris Agreement.[[14]](#footnote-15)
3. For children to be able to contribute effective remedies to environmental issues, they must have access to information relating to mitigation responses. This will give children agency to play a role in tackling climate change, through individual responses as well as through keeping States and industries accountable to the mitigation responses expected of them.
4. The Draft General Comment should therefore be amended to provide children with the right to access information related to climate change adaption and mitigation.

## Barriers to accessing information

1. The Draft General Comment stipulates that information should be disseminated in a manner that is appropriate to limited access to information technology.[[15]](#footnote-16) While making provision for limited access to information technology is commendable, the Draft General Comment fails to consider children who may have *no* access to information technology. Further barriers may include limited to no access as a result of gender discrimination, multiple and intersecting forms of discrimination in socio-economic contexts, and rural and urban divides.
2. As MMA has expressed elsewhere, access, or rather a lack thereof, is arguably the primary challenge when it comes to children meaningfully participating in the digital world.[[16]](#footnote-17) Without access, children cannot unlock the full array of opportunities offered by the internet, and cannot use the internet as a tool for fighting climate change.
3. Digital divides and their impact on access have been found, in many countries to manifest along gender lines.[[17]](#footnote-18) The gender digital divide hinders equal access and should be considered in this context. Moreover, and as noted elsewhere in the Draft General Comment, “certain groups of children face heightened barriers to the enjoyment of their rights in relation to the environment due to multiple and intersecting forms of discrimination.”[[18]](#footnote-19) The intersecting axis of discrimination can also manifest when it comes to children’s right to access information.
4. In many developing countries, such as South Africa, socio-economic and geographical factors impact whether children have access to technology or not.[[19]](#footnote-20) In order for there to be equality amongst children on an international and domestic level, information must be disseminated in ways so that it is available for children with access to varying levels of technology, including those with no access at all. If this is not achieved, there will be children whose rights are not realised as they effectively do not have access to climate change information.
5. Advancing access in light of the barriers could include, as suggested by the Committee, mass media campaigns, it may also include disseminating content in public spaces such as community centres, libraries, and spaces for public transport as well as campaigns carried by public broadcasters, and public and community radio stations. It may further include recommending that States address systemic barriers, and zero-rate websites that contain climate justice information (as was done during the pandemic by many states).
6. Accordingly, and within the context of equality in access to information, MMA proposes the following amendments to paras 85 and 86:

85. Children, in line with their bests interests and their evolving capacities, have the right to access ~~relevant~~ **all climate** information, including the causes, effects and actual and potential sources of climate and environmental harm, adaptive responses, **mitigation responses**, relevant climate and environmental legislation, regulations, findings from climate and environment impact assessments, policies and plans, and about appropriate lifestyle choices for sustainable development, for example, what children can do in their immediate environment related to waste management and consumption behaviours.

86. Information should be disseminated in a way appropriate to the age and capacities of children, overcoming obstacles such as illiteracy, disability, **gender inequality,** language, **socio-economic background**, distance and limited **or no** access to information technology, **recognising that certain groups of children face heightened barriers to accessing due to multiple and intersecting forms of discrimination**. States should encourage the mass media to disseminate information and materials regarding the environment, for example, measures that children and their families can take to manage risks in the context of climate-related disasters. **States should further embark on information campaigns and enable climate information to be disseminated in public spaces such as community centres, libraries, and spaces for public transport and through public broadcasters. States should further zero-rate websites that contain climate information.**

## The dangers of disinformation

1. MMA submits that disinformation may have far-reaching consequences, cause public harm, be a threat to democratic political and policy-making processes, and may put the protection of the public’s health, security and environment at risk. Disinformation erodes trust in institutions, as well as in the media, and harms democracy by hampering the ability of the public to make informed decisions. It can polarise debates, create or deepen tensions in society, and impair freedom of opinion and expression.[[20]](#footnote-21) Disinformation is a significant threat in the context of environmental justice and climate change. In 2014 the World Economic Forum identified the swift influx of digital mis/disinformation as one of the top ten harms to society.[[21]](#footnote-22) Nearly a decade later, the rise of social media has only exacerbated this problem.
2. MMA notes that the Draft General Comment places an obligation on States to “protect children from misinformation concerning environmental risks”. While this is an important inclusion, MMA submits that it does not consider disinformation. Moreover, the Draft General Comment fails to link the harms of climate disinformation with the right to access information and how this intersects with children advancing their rights in the context of climate change. MMA submits that additions be made to the sub-section on access to information to address this.
3. MMA supports the understanding that disinformation refers to all forms of false, inaccurate, or misleading information that is designed, presented, and promoted to intentionally cause public harm or for profit.[[22]](#footnote-23) Whereas misinformation is false information that is spread, regardless of any intent to mislead. MMA proposes that this distinction be referenced in the Draft General Comment, and that guidance is given on climate disinformation and climate misinformation. For example, climate disinformation is false, inaccurate, or misleading information about climate change that is designed, presented, and promoted to intentionally cause public harm or for profit.

## The impact of disinformation on children

1. Children are active users of social media, with online platforms frequently being the primary information sources for young people. As active digital users, children are often exposed to mis/disinformation. Despite this, children do not always have the cognitive and emotional capacity to distinguish between reliable and unreliable information.[[23]](#footnote-24)
2. UNICEF has found that children can have various relationships with disinformation – they “can be targets and objects of mis/disinformation, spreaders or creators of it, and opponents of mis/disinformation in actively seeking to counter falsehoods.”[[24]](#footnote-25)
3. Views based on inaccurate information can induce people to engage in environmentally harmful behaviours. Climate change mis/disinformation is closely linked to climate change scepticism and denial.[[25]](#footnote-26) As children are still developing their critical thinking skills,[[26]](#footnote-27) it is especially important to present children with information that is verified by the most recent and accurate scientific evidence to encourage environmentally responsible decision-making.
4. Mis/disinformation among parents, caregivers and educators has a negative effect on children, even if the child themselves is not directly exposed to it. What these other members of society are exposed to trickles down to what information children are exposed to, which could result in distorted or manipulated views of climate change.
5. Algorithms determine personalised news feeds, search results, content and recommendations based on individual profiles that have been generated by tracking user behaviour.[[27]](#footnote-28) Through the promotion of misleading, sensationalist and conspiratorial content rather than factual information, algorithms and other emergent technology, like artificial intelligence technologies, are key to the flow of mis/disinformation. This has been demonstrated on multiple occasions throughout recent years, the spread of COVID-19 mis/disinformation being an illustrative example.[[28]](#footnote-29)
6. In addition to the above, the most apposite explanation of the unique impact of climate disinformation on children has been made by the Article 12 members.[[29]](#footnote-30)
7. MMA strongly urges the Committee to explicitly recognise the harms of climate disinformation in the General Comment. MMA recommends that this be addressed in the section on the right to access information. MMA proposes the following wording for the consideration of the Committee:

**87. Climate mis/disinformation threatens the right to access information and can impact how children engage with and respond to environmental issues.[[30]](#footnote-31) Content that is created and shared with the intention to deceive and harm, or content that is curated using algorithmic personalisation to amplify certain content to particular users to influence narratives, can negatively shape a child’s view, cause significant harm to a child’s right to access information, and in turn impact their responses to climate change**. **Algorithms and curated content further risk limiting access to diverse content on climate change, hampering the ability of children to consider diverse views.** **Climate disinformation is particularly dangerous for children as it can negatively influence children’s behaviours, erode their adaptation and mitigation responses and jeopardise their involvement in the fight against climate change.**

## Digital literacy

1. In an increasingly online world, digital literacy is key to communicating and accessing information. Children must have digital literacy skills in order for them to access climate change information and know how to respond to climate disinformation.[[31]](#footnote-32) However, there are many children across the world who do not have these skills and are not taught these skills. This is particularly prevalent in developing countries, such as South Africa.[[32]](#footnote-33) This results in a skills gap and subsequent digital divides as noted above.
2. Critical digital literacy skills facilitate meaningful and active participation for children. Just as children learn about the environment, the risks, the myths, and the responses offline, they equally need to learn how to navigate these issues online. This includes making informed choices regarding the content they create, share, or receive.
3. In order for the Draft General Comment to achieve its goals, i.e. to enable children to realise their rights to express their views, to be heard, and to come up with effective remedies for environmental issues,[[33]](#footnote-34) children must be able to access and process information that is made available on digital platforms.
4. MMA, therefore, submits that the Draft General Comment must be amended to oblige States to actively progress children’s digital literacy, in order for them to be able to realise their rights to information and expression.

**88. States are also obliged to protect children from climate mis/disinformation and take all reasonable measures to ensure that children have access to digital literacy training to enable them to identify and know how to respond to climate disinformation in order for them be realise their rights to information. Digital literacy training should be provided in schools as part of the rights-based environmental education envisaged above (para 33).**

# **CONCLUDING REMARKS**

1. MMA welcomes and encourages the collaborative and inclusive approach of the Committee in engaging with the effects of climate change and children’s rights. We appreciate the opportunity to provide this submission to the Committee and we, along with the Article 12 Ambassadors, remain available to assist the Committee, including by providing further written or oral submissions at the appropriate time.
2. Please do not hesitate to contact us should you require any further information.

**Media Monitoring Africa**

**Johannesburg, 2023**

1. In addition to these activities MMA engages in strategic litigation on a range of media freedom and children’s rights related issues. MMA also runs a unique post graduate University accredited course on reporting on children. Further, MMA has developed a discussion document on children’s rights online, which has informed a workshop with our Web Ranger participants, who in turn have contributed to the drafting of a Digital Rights Charter that seeks to give effect to an internet that is accessible, safe and empowering, and that advances the development of children in line with their rights and interests, see MMA, ‘Children’s Rights Online: Towards a Digital Rights Charter’ (2020) (accessible [here](https://mediamonitoringafrica.org/wordpress22/wp-content/uploads/2020/11/1.pdf)). Most recently, MMA released another discussion document, focusing on disinformation through a children’s rights lens, see MMA, ‘Disinformation through a children’s rights lense’, (2022) (accessible [here](https://mediamonitoringafrica.org/wordpress22/wp-content/uploads/2022/10/Discussion-Document-Disinformation-through-a-childrens-rights-lens.pdf)). [↑](#footnote-ref-2)
2. The Web Rangers programme is run together with major partners including Google, Facebook, the Department of Communications and Digital Technologies, the Media Development and Diversity Agency and MTN. For more information, please see [webrangers.co.za](https://webrangers.co.za/). [↑](#footnote-ref-3)
3. For more information about MMA, please visit: [mediamonitoringafrica.org](https://mediamonitoringafrica.org/). [↑](#footnote-ref-4)
4. Committee on the Rights of the Child, Draft General Comment No. 26 (202x): Children’s rights and the environment with a special focus on climate change, June 2021 at para 4. [↑](#footnote-ref-5)
5. Id at para 85. [↑](#footnote-ref-6)
6. Committee on the Rights of the Child, ‘General Comment No. 25 on children’s rights in relation to the digital environment’ CRC/C/GC/25 (2021) at para 4. [↑](#footnote-ref-7)
7. Id at para 50. [↑](#footnote-ref-8)
8. MMA, ‘Disinformation through a children’s rights lense’ above n 1. [↑](#footnote-ref-9)
9. General Comment No. 25 above n 7 at para 1. See also UNICEF, ‘Growing up in a connect world’ (2019) (accessible [here](https://www.unicef-irc.org/publications/pdf/GKO%20Summary%20Report.pdf)). [↑](#footnote-ref-10)
10. Draft General Comment No. 26 at para 85. [↑](#footnote-ref-11)
11. UNICEF proposes a set of principles when it comes to advancing children’s right to access information online, including:

(i) the need to guard against unreasonable moderation of content; (ii) the need to enable children to explore the digital world without facing overly restrictive filters, systems, or mechanisms that may restrict access to potentially beneficial content; and (iii) the importance of children accessing information from a diversity of sources. MMA submits that similar considerations be given when contemplating access to climate change information. [↑](#footnote-ref-12)
12. NASA “Responding to Climate Change” *Global Climate Change: Vital Signs of the Planet* (accessible [here](https://climate.nasa.gov/solutions/adaptation-mitigation/)). See also, UNICEF, ‘ Toolkit for Young Climate Activists – Vol 1: Climate Glossary for Young People (accessible [here](https://www.unicef.org/mena/media/18526/file/Volume%20I%20%3AClimate%20glossary%20for%20young%20people.pdf)). [↑](#footnote-ref-13)
13. Id. [↑](#footnote-ref-14)
14. The United Nations, The Paris Agreement, 12 December 2015. [↑](#footnote-ref-15)
15. Id Draft General Comment at note 3 at para 86. [↑](#footnote-ref-16)
16. MMA, ‘Children’s Rights Online’ above n 1. [↑](#footnote-ref-17)
17. See Gender Digital Divide Index (accessible here). [↑](#footnote-ref-18)
18. Draft General Comment above n 16 at para 50. [↑](#footnote-ref-19)
19. Fekitamoeloa ‘Utoikamanu “Closing the Technology Gap in Least Developed Countries” *UN Chronicle* (December 2018) (Accessible [here](https://www.un.org/en/chronicle/article/closing-technology-gap-least-developed-countries)). [↑](#footnote-ref-20)
20. Joint Declaration on Freedom of Expression and ‘Fake News’, Disinformation and Propaganda (2017). This was published by the Special Rapporteur on Freedom of Opinion and Expression of the United Nations, the Representative on Freedom of the Media of the Organization for Security and Co-operation in Europe, the Special Rapporteur on Freedom of Expression of the Organization of American States, and the Special Rapporteur on Freedom of Expression and Access to Information of the African Commission on Human and Peoples’ Rights. [↑](#footnote-ref-21)
21. World Economic Forum “Outlook on the Global Agenda 2014” (2014) *Global Agenda* (accessible [here](https://www3.weforum.org/docs/WEF_GAC_GlobalAgendaOutlook_2014.pdf)) at 9. [↑](#footnote-ref-22)
22. European Commission “A multi-dimensional approach to disinformation: Report of the independent High Level

Group on fake news and online disinformation” (2018) *Publications for the European Union* (accessible here) at 10. [↑](#footnote-ref-23)
23. Philip Howard, Lisa-Maria Neudert, Nayana Prakash & Steven Vosloo “Digital misinformation/disinformation and children” *UNICEF* (August 2021) (accessible [here](https://www.unicef.org/globalinsight/media/2096/file/UNICEF-Global-Insight-Digital-Mis-Disinformation-and-Children-2021.pdf)) at 13. [↑](#footnote-ref-24)
24. UNICEF, ‘Digital misinformation / disinformation and children’ (2021) (accessible [here](https://www.unicef.org/globalinsight/media/2096/file/UNICEF-Global-Insight-Digital-Mis-Disinformation-and-Children-2021.pdf)). [↑](#footnote-ref-25)
25. Treen, Williams & O’Neill “Online misinformation about climate change” (2020) 11 *WIRES Clim Change* 1 (accessible [here](https://wires.onlinelibrary.wiley.com/doi/full/10.1002/wcc.665)). [↑](#footnote-ref-26)
26. Ozgul Polat & Ebru Aydin “The effect of mind mapping on young children’s critical thinking skills” (2020) 38 *Thinking Skills and Creativity* 1 (accessible [here](https://www.sciencedirect.com/science/article/abs/pii/S1871187120302170)) at 2. [↑](#footnote-ref-27)
27. Id. [↑](#footnote-ref-28)
28. Christina Pazzanese “Battling the ‘pandemic of misinformation’” *The Harvard Gazette* (8 May 2020) (accessible [here](https://news.harvard.edu/gazette/story/2020/05/social-media-used-to-spread-create-covid-19-falsehoods/)). [↑](#footnote-ref-29)
29. In this regard, the following submissions warrant emphasis:

*“Social media and other online spaces can be very influential and can be spaces where disinformation breeds. When disinformation about the climate is spread in these spaces young people may be influenced to continue with harmful environmental practices. Young people may also be influenced to ignore important issues like climate change.*

*…*

*Climate disinformation is also dangerous because it can change how people behave and can mislead them on how to act towards the environment. We believe that climate disinformation is dangerous because it causes people to make inaccurate decisions which may cause harm to the environment.*

*We can do better, and we can be better if we have access to accurate information. We can learn more about how to mitigate environmental harms, we can learn how to adapt to the climate, and understand how our actions can be harmful or beneficial.*

*Disinformation closes off the opportunity for us to do this.”* [↑](#footnote-ref-30)
30. Climate disinformation is false, inaccurate, or misleading information about climate change that is designed, presented, and promoted to intentionally cause public harm or for profit. Climate misinformation is false information about the climate that is spread, regardless of any intent to mislead. [↑](#footnote-ref-31)
31. MMA submits that digital literacy includes critical skills development such as finding, evaluating, and managing information online, identifying content that may amount to climate mis- or disinformation, navigating and exploring new spaces, cognisant of risks and harms; interacting, sharing, and collaborating online, and developing and creating content. See UNICEF, ‘Children in a digital world’ and Web rangers <https://webrangers.co.za/>. [↑](#footnote-ref-32)
32. The Department of Communications and Digital Technologies “Implementation Programme Guide: For the National Digital and Future Skills Strategy of South Africa 2021-2025” (2021) (accessible [here](https://www.gov.za/sites/default/files/gcis_document/202203/digital-and-future-skillsimplementation-programmefinal.pdf)) at 8. [↑](#footnote-ref-33)
33. Id Draft General Comment at para 84. [↑](#footnote-ref-34)