**Call for comments on the draft general comment on children’s rights and the environment with a special focus on climate change**

**Submission from World Vision International**

**15 February 2023**

World Vision would like to welcome the elaboration by the Committee on the Rights of the Child of the draft General Comment on Children’s Rights and the Environment with a Special Focus on Climate Change. Considering that the United Nations General Assembly adopted a historic resolution in 2022, declaring access to a clean, healthy and sustainable environment a universal human right, it is imperative that the States obligations and commitments to the same right for children are clearly defined. Furthermore, the Sharm el Sheikh Implementation Plan, drafted after the last Conference of Parties of the United Nations Framework Convention on Climate Change (UNFCCC), COP27, recognises children as agents of change in addressing and responding to climate change. Hence, a General Comment on children’s rights and the environment should give an impetus for the States and international community to increase policy coherence between child rights and the humanity’s fight against climate change.

World Vision is a Christian relief, development, and advocacy organisation dedicated to working with children, families, and communities to overcome poverty and injustice. Inspired by our Christian values, we are dedicated to working with the world’s most vulnerable people. We serve all people regardless of religion, race, ethnicity or gender. Our Core Value 'We are Stewards' is rooted in our Christian faith and as stewards of God’s creation, we care for the earth and act in ways that will restore and protect the environment.

Children are the hardest hit by the negative impacts of environmental degradation and climate change. Here are the main areas of concern for World Vision.

**Children’s right to survival and development**

* Children are severely affected by the food insecurity and famine caused by draught and other natural disasters (such as landslides caused by deforestation) triggered by declining biodiversity and climate change.
* Children’s physical development and health is undermined by a lack of diversity of food and nutrients.
* Pollution of air and water sources, in particular in urban informal settlement, leads to incidents of water borne diseases and poor absorption of nutrition, resulting in children’s poor health and malnutrition.
* Children’s spiritual, moral and social development is affected due to the lack of access to and degradation/destruction of spiritual and religious sites, aspects of the environment which are crucial to cultural and religious expression.
* Applying the concept of evolving capacities of children, we suggest to change the wording of the Paragraph 22, Section III. 2. Instead of “as children mature,” we recommend the verb “evolve” to replace the word mature.

**Children’s right to play in safe environment**

* Children are being denied the right to experience the joy and wonder of nature, playing on land or in water safely, or at all, in particular in urban informal settlement, climbing a tree, seeing wildlife and enjoying the beauty of nature.
* Children are denied safe, clean plentiful water, and land that produces abundantly and consistently, air that does not damage their lungs.

**Children’s right to adequate standard of living**

* In rural areas, communities depend on the forests for food, health and source of income. Depletion of resources affects livelihoods, which in turn affects the capacity of parents and caregivers to provide well for their children’s needs (education, transport costs to the nearest clinic)

**Children’s rights to be heard and procedural rights**

* Procedural Rights including children’s rights to be hard and participate: while paragraph 74 acknowledges that procedural rights are of similar importance however the structure does not imply this. In order to ensure children’s meaningful participation, the document should state clearly the responsibilities of the States as guarantors of children’s rights to participate.

World Vision would like to take this opportunity of this call for inputs based on our experience with working with children in the most vulnerable situations.

1. **Lack of urgency and gravity of the climate crisis**

Childhood does not last long, and yet the negative impact of environmental degradation and climate change may have a lifelong impact. As children’s unique development needs mean they are especially vulnerable to climate change impacts,[[1]](#endnote-1) the climate crisis risks reversing 25 years of gains made in child health and reducing child mortality.[[2]](#endnote-2) UN experts clearly state that climate change is the greatest threat to human kind, and “human rights are negatively impacted and violated as a consequence of climate change” ([OHCHR 2022](https://www.ohchr.org/en/press-releases/2022/10/climate-change-greatest-threat-world-has-ever-faced-un-expert-warns)). However, the overall impression of the General Comment does not portray the message of urgency. For example, the Article 1 should clearly states that children’s rights are negatively affected and in many cases violated due to environmental degradation and climate change.

1. **The role of faith**

While the Convention of the Rights of the Child mentions freedom to manifest one’s religion or faith (Art 2.2 and Art.14), the General Comment 26 as no mention of beliefs nor faith. In many communities, including indigenous, environment and religious and cultural identities are deeply intertwined. Moreover, faith actors are increasingly playing an important role for environmental education, advocacy and care for creation. World Vision strongly recommends to include how one’s religion and belief play a vital role in children’s relationship with the environment.

1. **Child rights impact assessment**

World Vision welcomes the recommendation on child rights impact assessment (D.) World Vision recommends chid rights impact assessment not to be a separate assessment, but as part of the mandatory environmental and social safeguarding processes for policy making. Moreover, the principle of the best interest of the child should be clearly stated under the section D.

1. **Climate change and the overall structure of the document**

The section VI. Climate Change seems to be artificial and repetitive of the some of the articles mentioned in the previous sections, as climate change is linked to environmental degradation. For a separate section on climate change, it is important to highlight the concept of climate justice (as per the UNFCCC and the Paris Agreement). Climate finance section in particular is not as clear as the targets stated by the Sustainable Development Goals nor the Paris Agreement. World Vision recommends the mention of the loss and damage fund as per the agreement made at the last UNFCCC COP27.

1. **Children’s rights right to be heard and participate**

Paragraph 4 recognises Children, as agents of change which is reflective of the momentous activism carried out by children and young people globally. However, the General Comment would also benefit from a recognition of the fact that this is also an injustice and unfair burden. We agree that children should be included in defining the response to the climate crisis, but we must ensure a balanced approach and not a transfer of burdens to children to solve an issue not of their making.

1. **Impacts on girls**

While the documents does highlight in places the differentiated needs of boys and girls overall it would benefit from a stronger recognition of the fact that climate change and environmental issues often impact women and girls more than man and boys. A recommendation in light of this would also be welcome.

**Annex**

Recommendations from Children (verbatim) during the African Children’s Parliament held in Lusaka, Zambia in July 2022 organised by the Joining Forces (World Vision, Save the Children, Plan, TdH, ChildFund and SOS), UNICEF and Government of Zambia:

* Invest more resources in information dissemination so that more people can know how to reuse, reduce and recycle materials instead of burning.
* Implement and enforce environmental protection laws. Many people are breaking the law for example they cut down trees and pollute the environment but there are no consequences.
* Governments must make use of new technology like solar and biotechnology that can reduce carbon emission and promote afforestation efforts.
* Prioritize research on environmental protection and indigenous knowledge systems.
* Provide water in areas which do not have water.
* Change the school calendar so that pupils can go on holidays in winter because it is getting cold. In Malawi for example, children are trying to find solutions by sawing sweaters to keep warm but we need help from governments.
* Prioritize environmental child participation and give children platform to engage in climate change conversations. Children have a voice, listen to them.
* Reconstruct infrastructure damaged by floods for example classrooms and health centres. Buildings should not be put up in near hazardous or polluted environments like mines. We are asking for more schools to be built in climate affected areas.
* Ensure children affected by climate change are given priority, especially children being married off at an early age, special needs children, differently abled and children on the streets.
* African leaders and children should unite and speak with one voice on climate change.

1. United Nations Office of the High Commissioner for Human Rights (2017), ‘Analytical Study on the Relationship between Climate Change and the Full and Effective Enjoyment of the Rights of the Child (A/HRC/35/13)’, <https://ap.ohchr.org/documents/dpage_e.aspx?si=A/HRC/35/13>. [↑](#endnote-ref-1)
2. # Philipsborn, P and Chan, K (2020), *Climate Change and Global Child Health*, <https://pediatrics.aappublications.org/content/pediatrics/141/6/e20173774.full.pdf>.

   [↑](#endnote-ref-2)