**Draft general comment No. 26 on children´s rights and the environment with a special focus on climate change**

**I. Introduction**

**Section A. A child rights-based approach to the environment**

* P. 8- We suggest to add “children who live in highly vulnerable regions to the adverse effects of climate change”

“Conversely, environmental degradation adversely affects the enjoyment of these rights, in particular for specific groups of children including children with disabilities, Indigenous children, **children who live in highly vulnerable regions to the adverse effects of climate change** and children working in hazardous conditions.”

**III. Specific rights of the Convention as they relate to the environment**

**Section A. The right to life, survival and development (art. 6)**

* P. 16- It would be important to consider and add “desertification” as one of the environmental/ planetary crises.

“The right to life is threatened by avoidable environmental impacts including climate change, pollution, biodiversity degradation and **desertification**.”

**Section B. The right to the highest attainable standard of health**

* P. 25- We suggest to add “degradation of land”

“Climate change, biodiversity loss and the degradation of **land** and ecosystems create new obstacles for the realization of children’s right to health.”

“Climate change, pollution and toxic substances all represent key drivers of the alarming loss in biodiversity and degradation of **land** and ecosystems on which human health depends.”

**Section F. The right of Indigenous children**

* P.49 – We suggest to add “biodiversity loss and desertification”

“Indigenous children are disproportionately affected as a result of environmental degradation, pollution, climate change, **biodiversity loss and desertification**.”

**V. General obligations of States**

**Section A. The obligation to respect, protect and fulfil**

* P. 75- We suggest to add “land degradation”

“The obligation to respect requires States to refrain from violating children’s rights by causing environmental harm, for example by subsidizing products or activities that produce toxic pollution, damage biodiversity or contribute to **land degradation** and climate change.”

**Section G. International cooperation**

* P. 95- It would be valuable to integrate “loss and damage”

“In particular, high-income States should support adaptation and mitigation efforts **as well as responses to address loss and damages caused by climate change** in developing countries by facilitating the transfer of green technologies, and by contributing to financing climate mitigation, adaptation, and **loss and damage** in line with their internationally agreed climate finance goals.”

**VI. Climate change**

**E. Climate finance**

* P. 121- We suggest to consider “**resilience capacities**”

“The current climate finance gap which is overly slanted towards mitigation at the cost of adaptation measures has discriminatory effects on children who live in settings where more adaptation measures and **resilience capacities** are needed. States should bridge the global climate finance gap, with a view to equal distribution which considers **measures on adaptation, mitigation, loss and damage and means of implementation.** Moreover, the determination by States of the total global climate finance needed should be informed by the documented needs of communities especially children and their rights.”

*CZL/JAG/VCC*