**WRITTEN SUBMISSION TO THE DRAFT GENERAL COMMENT No. 26 OF THE COMMITTEE ON THE RIGHTS OF THE CHILD ON CHILDREN’S RIGHTS AND THE ENVIRONMENT WITH A SPECIAL FOCUS ON CLIMATE CHANGE**

**Plan International**

1. **INTRODUCTION**

[Plan International](https://plan-international.org/) is an independent non-governmental organisation and is in General Consultative Status with ECOSOC. We strive to advance children’s rights and equality for girls in both development and humanitarian contexts. Plan International advocates for the inclusion of a gender and intersectional perspective throughout the draft General Comment on children’s rights in relation to the environment, recognising the discrimination faced by girls that result in inequal access to their rights. It is also crucial to acknowledge how different forms of discrimination based on race, ethnicity, sexuality, age, disability and economic status can have huge impacts in how they are affected by environmental degradation and climate change.

1. **SUGGESTIONS FOR ADDITIONAL AREAS OF FOCUS:**
	1. **Gender**

Guidance on children’s rights relating to the environment and climate must consider gender, equality and intersectionality in order to advance climate justice and ensure those most affected are included in policies, action and solutions. Likewise, as highlighted in the draft General Comment, intergenerational equity must be at the heart of decisions on climate and the environment. Children and marginalised groups have contributed the least to the crisis but will be affected the most. Despite this, their rights, specific needs and voices are often missing from environmental and climate policies and action.

The climate crisis is deepening existing inequalities and rolling back progress made towards the Sustainable Development Goals. Discriminatory social and gender norms mean girls in all their diversity are often more affected by climate change and environmental degradation, yet have the fewest resources to cope. For example, indigenous women and girls, who are often forced to defend their territories, resources and rights from extractive industries, face intersecting and reinforcing forms of violence.[[1]](#footnote-2) According to recent Plan International feminist participatory action research in Zambia and Zimbabwe, girls identified school dropouts and an increase in child, early and forced marriages and unions (CEFMU) as two of the most common impacts of climate change.[[2]](#footnote-3)

Climate impacts routinely place girls, especially during adolescence, at increased risk of human trafficking, sexual and gender-based violence and disruption in access to sexual and reproductive health information, services and maternal and postnatal care. Adolescent girls, particularly in the most affected countries, face being pulled out-of-school to help alleviate the additional domestic and economic burdens that are shouldered by women in households facing climate-related shocks and stress. This also places them at greater risk of CEFMU and unwanted or unintended adolescent pregnancy, limiting their future economic prospects and possibly having a detrimental impact on their own health and wellbeing and that of any children. This can direct girls into a vicious cycle of intergenerational poverty, vulnerability, and further marginalisation.

This is particularly concerning as out-of-school girls are less likely to return, particularly once married or having become a mother, potentially resulting in having less access to information and skills needed to respond to climate and environmental impacts.

Through the following points and subsequent Sections b-f, Plan International suggests:

* Para 46: **“**Children, *particularly, children with disabilities,* ***and children experiencing other intersecting forms of inequality, including*** those living in poverty …”
* Para 63 “Effective remedies should be available to redress violations.This requires States to provide ***child-friendly, gender-responsive, and disability inclusive*** pathways for children to access justice.”
* Para 65: “Child-sensitive, ***gender-responsive, and disability inclusive*** procedures should be available for claims of imminent or foreseeable harms, as well as past or current violations of children’s rights”
* Para 79: “plans that are science-based, ***inclusive, age, and gender-responsive*** and consistent with”
* Para 85: “Access to ***gender-responsive, child-friendly*** information” *(arts 13 and 17)*
	1. **Education**

Plan International welcomes the paragraphs in Section III D highlighting both the impact of climate change on education, especially girls’ education, and the role of education in responding to the crisis, although both the negative and positive aspects could be made clearer.

We recommend further strengthening 1) the gendered impacts of climate change on education, and 2) the critical need for a more resilient education sector that can ensure continuity of education despite environmental and climate crises.

Girls are often removed from school, or prevented from returning, in times of crisis. Research estimated that climate-related events in 2021 would have prevented at least four million girls from completing their education in low- and middle- income countries. If current trends continue, by 2025 climate change will be a contributing factor in preventing at least 12.5 million girls from completing their education each year.[[3]](#footnote-4)

This will further entrench gender gaps in education and undermine girls’ ability to adapt to climate impacts, which can prevent them from gaining the necessary knowledge and skills for community-based adaptation, resilience, climate activism and future secure livelihoods. Education is a crucial pathway to support and enable adaptive capacities, pro-environmental behaviours and girls’ leadership.

It is also vital that the education system is resilient to climate and environmental shocks and stresses to support continuous access to education for all children, especially those most at risk. In particular, the [Comprehensive School Safety Framework](https://gadrrres.net/comprehensive-school-safety-framework/) provides an evidence-based, participatory approach to strengthening the resilience of the education system through three pillars: Safer Learning Facilities, School Safety and Educational Continuity Management, and Risk Reduction & Resilience Education.

We recommend:

* **Para 33: “**Curricula should **~~reflect changing environments and new environmental science.~~ *be evidence and science-based, contextually relevant, gender-responsive and inclusive, and include indigenous knowledge and rights.*** Teaching materials should provide accurate, updated, and age- and developmentally-appropriate environmental information. ***All climate and environment information being taught in schools must be from reliable, reputable sources, based on best available science.*** All children should be equipped with the ***knowledge* *and*** skills necessary ***to anticipate, adapt and respond to* ~~face~~** expected environmental ***and climate shocks and stresses* ~~challenges in life~~** such as disaster risks...**.”**
* **Para 35: “**Exploratory, non-formal**, *action-oriented*** and practical methods such as outdoor learning are an important way of delivering this aim of education. ***Teaching methods should be learner-centred and gender-responsive and prioritise students’ well-being Ensure all climate information being taught in schools is from reliable, reputable sources, based on the best available science.”***
* **Para 36: “*These facilities must be gender-responsive, taking into consideration the additional needs and vulnerabilities girls face.* ~~especially for girls~~.**”
* **para. 36 bis:** ***States should strengthen the resilience of the education sector in the face of climate change and environmental degradation, including through multi-sectoral, crisis-sensitive and risk-informed planning and programming, with a comprehensive approach to school safety and provision of quality education in emergencies, in consultation with children, teachers and parents.***
* **Para 37:** States should ensure ***safe*,** physical access to schools during severe weather events... .
* **Para 38:** States should also ***recognise and*** address the ***disproportionate impact of climate change and environmental degradation on girls’ education*****~~knock-on effects resulting from environmental impacts on children,~~** such as the need for girls to leave school due to the additional domestic and economic burdens in households facing environment-related shocks and stress***or child, early and forced marriage.***
	1. **Child protection and gender-based violence**

The draft General Comment goes some way in acknowledging the extent to which “a clean, healthy and sustainable environment is necessary for the full enjoyment of a broad range of children’s rights”, including the right to be protected from violence and exploitation (para 8). We welcome the ways in which the General Comment highlights States’ duties to take measures to both prevent and respond to the impacts of climate change on children’s right to live free from all forms of violence, including emphasising the prevention of climate degradation as a means of fostering “the resilience of children and their communities” (para 102); requesting “States should take additional measures to ensure that vulnerable children affected by climate change enjoy their rights, including by addressing the underlying causes of vulnerability” (para 106); and calling for States to ensure “a coherent approach in mainstreaming climate action across all decisions and measures concerning children, including policies related to child protection and health” (para 104).

Nevertheless, Plan International believes there is a need to further emphasise the importance of protection against all forms of violence as per Article 19 of the CRC, including highlighting the potential and real increased risk of physical or mental violence, injury or abuse, neglect or negligent treatment, maltreatment or exploitation, including sexual abuse and other harmful practices due to environment degradation and climate change and the action needed to prevent and respond. **In this regard, Plan International supports the recommendations made by the Advocacy Working Group (AWG) of Alliance for Child Protection in Humanitarian Action in its submission[[4]](#footnote-5).**

In addition, Plan International recommends the General Comment specifically recognise the additional risk girls face from gender-based violence. Climate change impacts routinely place girls, especially during adolescence, at increased risk of exploitation, violence and disruption in access to health and protection services. It can also contribute to increases in harmful practices such as CEFMU and female genital mutilation and cutting (FGM/C) due to economic stress, disruption to education, and poverty induced by climate change and environmental degradation.

A recent assessment of the effects of drought on children and women undertaken in Somalia reported that 25 percent of respondents indicated increased prevalence of violence against girls and women, including sexual assault, domestic violence, (FGM/C), sexual harassment and abuse and CEFMU.[[5]](#footnote-6)

* In particular, we support the Advocacy Working Group of Alliance for Child Protection in Humanitarian Action recommendation on integrating a standalone paragraph on child protection in section III, under current section E, entitled: **“The right to protection to all forms of violence (art 19).”**

In addition to their detailed recommendations, we also suggest:

* Para 8, “*protection from violence,* ***including sexual and gender-based violence****, and exploitation*.”
* Under Section V D add: ***“States should recognise the increased risk of all forms of violence that children, especially girls, face during climate crises and ensure climate and environmental policies and action protect children, including strengthening the resilience of protection and health systems, and ensuring other forms of prevention and reporting.”***
	1. **Sexual reproductive health and rights**

The draft General Comment does not sufficiently recognise the additional health needs and vulnerabilities adolescent girls face in times of climate and environmental crises. The climate crisis is a contributing factor to forced displacement, straining the capacity of health systems and interrupting sexual and reproductive health (SRH) services. There is also strong evidence linking climate change to negative health outcomes and a lack of access to SRH information and services which in turn negatively impacts the ability for girls to make autonomous and informed choices about their SRH, including access to safe and modern forms of contraception, safe abortion, and anti-retro virals.

CEFMU and unintended and unwanted adolescent pregnancy can have serious adverse SRH impacts in addition to limiting the future potential of girls. Girls who become pregnant before the age of 15 are more susceptible to placental tears, obstruction at the time of delivery, maternal morbidity and mortality. For displaced girls in humanitarian settings, lack of access to SRH services is the leading cause of death. Food insecurity, infectious disease and environmental exposures to toxins, polluted air and water can also have lifelong implications for both pregnant people and their foetuses.

We recommend strengthening Section III B on the right to health to recognise the links between climate change and environmental degradation on girls’ health:

* Para 24: Pollution associated with industrialization, including exposure to toxic substances and hazardous waste, present more complex and uncertain threats to health, often resulting in effects long after exposure. ***“Adolescent girls and pregnant or lactating young mothers face additional needs and greater health risks associated with climate change and environmental degradation, especially air and water pollution, hazardous waste and toxic substances and in accessing gender-responsive sexual and reproductive healthcare.”***
* Para 23: “The right to health includes access to timely and appropriate ***age and*** ***gender-responsive*** health-care services ***including sexual and reproductive health information and services*** and to the underlying determinants of health, such as a healthy environment, and the facilities, goods, services and conditions necessary for the realization of the highest attainable standard of health. ***These services should be part of universal health coverage, ensuring that they are acceptable, available, accessible and of good quality, with proper investment in resilient service provision for continued service provision in times of crisis, including for displaced children***.”
	1. **Adaptation**

We welcome the section on adaptation, given the urgent need to scale up adaptation financing and action in support of children’s rights. We recommend streamlining and simplifying the structure of the section in addition to:

* Para 104: “Since climate-related impacts are intensifying, a sharp and urgent increase in the design and implementation of child-sensitive, ***gender-responsive, locally-led*** adaptation measures and associated resources is necessary. States should identify climate-related child vulnerabilities depending on the availability, quality, equity and sustainability of essential services for children, such as water and sanitation, health care, nutrition, ***protection*** and education.” “Examples include strengthening child protection systems in risk-prone contexts, providing adequate and ***continuous*** access to water, sanitation and healthcare, including SRHR, …development.”
* Para 104 bis: ***States must strengthen the resilience of key services that realise children’s rights for example through developing multi-risk assessments, including differential vulnerability assessments, contingency plans, and preparedness plans which inform inclusive service continuity plans and action plans at different levels. Ensure key sectors have access to early warning systems and that early warning information is accessible to everyone in the community and is age and gender-responsive.***
* Para 105: “Adaptation measures, including disaster risk reduction, ***anticipatory action***, preparedness, response and recovery, should take into account the views of ***all*** children ***and potential participation of children****,* ***and ensure that locally-led initiatives are considered***. Children should be ***equipped with knowledge and skills*** ~~able~~ to understand the effects of climate actions on their rights and have opportunities to meaningfully participate in decision-making processes.”
* Para 106: “States should adopt ***DRR plans***, emergency response plans ***and service continuity plans*** such as provision of humanitarian assistance and access to food and water and sanitation. ***The Comprehensive School Safety Framework provides clear guidance on strengthening the resilience and adaptation of education systems …*** Furthermore, adaptation frameworks should address climate-related migration ***and displacement*** and include provisions for ensuring a child rights-based approach to migration. ***The risk of******unintended consequences of adaptation measures - referred to as “maladaptation” - on children, particularly children facing compounding inequalities and forms of discrimination, should be accounted for.”***
* Para 107 bis: ***States should fund and implement anticipatory action, based on early warning indicators, and apply this approach to social sectors such as health, education and protection to support continuous access to services.***
	1. **Climate finance and loss and damage**

As part of Section VI D we recommend further strengthening the language on climate finance. It is vital to urgently scale up climate finance that is gender and child sensitive and responsive to the specific and additional needs of children, especially girls, including provisions for strengthening health, education and protection systems. It should also be accessible to child-led groups and networks, targeted towards grassroot groups of children creating climate solutions, and has the direct equal engagement of children. It should support locally-led adaptation that strengthens the decision-making power of, and direct implementation by, affected people and communities and upholds children’s rights.

Para 120: *“In particular, States should* ***encourage the use of specified metrics to ensure child-sensitive investment and*** *ensure that any climate finance mechanisms uphold and not violate children’s rights; increase policy coherence between child rights obligations and other objectives, such as economic development;* ***include children’s views*** *and strengthen the demarcation of roles of various stakeholders in climate finance...”*

We would also recommend the **inclusion of Loss and Damage, including the new Loss and Damage Financing Facility**. The development of such a facility should include policies and guidance on protecting and promoting children in all their diversity and their rights. It should include mechanisms to support non-economic losses, particularly those magnified by gender, age and other intersectional barriers that increase unpaid care work and gender-based violence as well as a loss of education, Indigenous knowledge and SRHR.

1. **STRUCTURE AND TERMINOLOGY**

We support the **Child Rights Connect Working Group on child rights and environment submission recommendation** on changes to the structure.

**Key concepts/terminology:**

**Climate justice** – Given there are references to children’s role in the climate justice movement, the framing of climate justice needs to be more central throughout, with a clear recognition of the links between intergenerational equity, gender equality and climate justice.

**Intergenerational equity** – Section B needs to include a clear definition on intergenerational equity including its links to climate justice.

**Sustainable development** – We support the CRC submission in defining sustainable development.

**Intersectionality –** Need consistency on listing specific groups of children who may face additional discrimination or challenges as the groups vary throughout the paper. Unless there are specific reasons otherwise, we suggest using the language in para 105 consistently throughout “young children, girls, children with disabilities, children on the move, Indigenous children and children in situations of poverty.”

**In Section III G – non-discrimination**: “minority groups” should be replaced by another term that better emphasizes the racial dimension of discrimination, which is a fundamental environmental and climate justice issue. It is unclear and inaccurate to overlook race in non-discrimination and only focus on “minority groups”. Itis important to highlight there is no climate justice without racial justice.

1. IUCN <https://portals.iucn.org/library/sites/library/files/documents/2020-002-En.pdf> [↑](#footnote-ref-2)
2. Plan International (2021) [Adolescent Girls in the Climate Crisis: Voices from Zambia and Zimbabwe](https://plan-international.org/publications/adolescent-girls-in-the-climate-crisis-voices-from-zambia-and-zimbabwe/) [↑](#footnote-ref-3)
3. Malala Fund (2021) A greener, fairer future: Why leaders need to invest in climate and girls’ education. [↑](#footnote-ref-4)
4. Plan International co-authored the submission of the Advocacy Working Group (AWG) of Alliance for Child Protection in Humanitarian Action. [↑](#footnote-ref-5)
5. Republic of Somaliland Ministry of Employment, Social Affairs and Family (February 2022) [Child Protection and GBV Rapid Assessment on the Effect of Drought to Children and Women in Somaliland](https://mesaf.govsomaliland.org/site/downloadfile/file/MjAyMi8wMy8yMDIyLTAzLTE0LTA1LTI0LTA3LTk3NDMtMTY0NzIzNTQ0Ny5wZGY%3D/view/1), [↑](#footnote-ref-6)