

**COMMENTS BY SAVE THE CHILDREN ON  
1<sup>ST</sup> DRAFT OF THE GENERAL COMMENT 26:  
CHILDREN'S RIGHTS AND THE ENVIRONMENT WITH SPECIAL FOCUS ON CLIMATE CHANGE**

Save the children launched an internal consultation, across offices and thematic expertise, on the draft General Comment (draft GC26) on child rights and the environment with special focus on climate change. We have the following comments to the draft GC26, which includes the annexed document of the draft GC26 with suggested editing through track-changes:

**GENERAL COMMENTS TO THE OVERALL DRAFT:**

**On the practical and concrete aspects of the GC26 as a guidance to State Parties to the Convention on its implementation, in light of the right of children to a clean, safe and sustainable environment:**

We find the draft GC26 to be very useful in identifying some of the salient issues related to child rights and the environment. However, we have the following suggestions to make GC26 even clearer and more practical and concrete. We recommend:

- **Clearly stating upfront the recognition of children's right to a clean, healthy and sustainable environment** as a new human rights standard recognized by the UN General Assembly in September 2022 (and before that, by the Human Rights Council) and that this right **constitutes the basis for fulfilling all other child rights**. Currently, this is very ambiguous in the text as it states that the environment is "implicit in, and directly linked to, in particular, the rights to life, survival and development (art. 6), the highest attainable standard of health, including 'taking into consideration the **dangers** and **risks** of environmental pollution'; instead of recognizing upfront the right of children to a clean environment and **the actual** (not risks or dangers) negative impact that environmental degradation and climate change has on child rights. The current changes and the evidence on the devastating impacts of environmental degradation and climate change in children, leads the Committee to recognize the need for an evolving interpretation of the Convention in order to respect, protect and fulfill child rights in the present world context.
- **Promoting a holistic understanding of environmental degradation and climate change as two inter-related concepts** (rather than separating the two – see further explanation below in *Comments on Introduction*)
- **Indicating more explicitly within the same (rights and obligations) section the concrete measures and actions States should take to implement a child's right to a clean, healthy and sustainable environment**, in light of the specific provisions of the CRC, including the General Measures of Implementations, which will serve as a basis for **State Party reporting process** as well as other relevant human rights monitoring processes.

- When addressing the above, **concrete action should be listed for governments to address environmental degradation and climate impacts specifically on** children with disabilities, Indigenous children, displaced, refugee and migrant children, girls and children discriminated against on the basis of their sexual orientations, gender identities and expression (SOGIE), children living in urban slums and geographically isolated areas, children working in hazardous conditions and those who experience intersecting and compounding forms of discrimination and marginalization.
- Importance of laying out more explicitly the **General Measures of Implementation** through a separate section.

### **Suggestions to strengthen the sense of urgency and evidence:**

At the outset of the document the sense of urgency should be conveyed through key statistics showing that this is the biggest crisis facing humanity, with a disproportionate impact on children and future generations. For example, a 2017 report by WHO, *Inheriting a Sustainable World: Atlas on Children's Health and the Environment*, **states that every year at least 1,7 million children below the age of 5 die as a result of air and water contamination as well as exposure to toxic substances and other environmental damage.**

[The Intergovernmental Panel on Climate Change \(IPCC\)](#) also provides evidence of the impact of climate change on children (June 2022), that is crucial to mention in GC26: “children aged ten or younger in the year 2020 are projected to experience a nearly **four-fold increase in extreme events under 1.5°C** of global warming by 2100, and a five-fold increase under 3°C warming.” Such increases in exposure would not be experienced by a person aged 55 in the year 2020 in their remaining lifetime under any warming scenario.”

The level of urgency needs to be portrayed consistently throughout the document, at each section of rights referring to statistics that demonstrate the devastating impact environmental degradation, pollution and climate change has on children and their rights.

Language throughout the text needs to be stronger. Phrases like “toxic substances *may* have an impact”, “there is a *risk* that...”, “has the *potential* of...” need to be made more assertive, concrete and factual in light of the evidence. (See below more on data, statistics, and evidence)

### **Suggestions on the structure of the draft GC:**

The following are some suggestions to improve the structure of the GC:

- The explicit and unambiguous recognition of **children's right to a clean, healthy and sustainable environment** should be included upfront in the terms stated above.
- See below specific comments on the structure of **section III**, which we propose to merge with **Section V**
- Integrate **Section IV** in the rights and obligations sections. It is repetitive and not useful as a stand-alone section
- **Integrate climate change** in sections on rights and obligations and do not treat separately (See below paragraph on this under *Comments on the Introduction*)

### **Suggestion to address gaps:**

The following are issues that could be included or further elaborated:

**Links between environmental degradation, climate change and violence against children:** we recommend to include reference to the following: [Extreme weather events are increasing children's exposure to violence and exploitation in a number of ways](#). Stressors on families stemming from uncertainty, shocks, and life-changes can increase violence in the home. Pressure on livelihoods can lead to negative coping strategies such as children's removal from school, involvement in child labour, and child marriage. Human security and children's safety and wellbeing will also be threatened as environmental degradation worsens and climatic conditions become more unpredictable and extreme, adding to the complex interplay of socio-economic and political factors that lead to conflict. [The ongoing insecurity as a result of conflict and climate shocks in the Sahel has seen 8 in 10 children experiencing violence](#), with many fleeing and becoming exposed to increased risks of exploitation and abuse. With the drivers of conflict heightened, more children will be exposed to risk of death, injury, displacement, violence, attacks on education and long-term impairments. Girls are typically at far higher risk of sexual and other forms of gender-based violence, while boys are more likely to be exposed to killing and maiming, abductions and recruitment to armed groups. Children with disabilities also face particular risks of being deprioritized and excluded, abandoned or trafficked. All these situations can have long-term effects on children's health, development, safety and psychological well-being.

**Links between gender and environmental degradation and climate change:** we recommend strengthening reference to this issue. In the case of extreme weather events girls are removed from school at higher rates than boys, often to take up unpaid care duties within the home; they are more likely to experience food insecurity due to e.g. historic social hierarchies; they face higher risks of violence, exploitation and abuse when evacuated to unsafe shelter facilities; and they are pushed into marriage as a perceived means of coping with shocks, particularly household economic strain following extreme events. Many girls also face gender-specific threats and violence in response to their climate and environmental advocacy, which is seen as challenging gender norms. Further, they often face increased household burdens in areas affected by climate change, e.g., as they are constrained to walk further to fetch water.

### **COMMENTS ON THE INTRODUCTION**

The introduction explains the many important points the document develops further in the following pages. It would be important to also include in the following elements:

- Explicit and clear recognition, at the beginning of the introduction, of the **children's right to a clean, healthy and sustainable environment**, in the terms described above.
- Key statistics on the specific **impacts of environmental degradation and climate change on children**, in the terms described above.
- The fact that children are disproportionately affected by environmental degradation and climate change and therefore are particularly **vulnerable** to the impacts. It would also be helpful to consider the intersectionality of inequality and discrimination experienced by children with disabilities, Indigenous children, displaced, refugee and migrant children (see below proposed separate section on children on the move), girls and children discriminated against on the basis

of their sexual orientations, gender identities and expression (SOGIE), children living in urban slums and geographically isolated areas and children working in hazardous conditions.

- Information on **consultations**, particularly **consultations with children**. A decision needs to be made as to how to reflect the linkage between the GC and the elements emanating from consultations. It does not seem appropriate to include only one citation from children. There could be more citations as appropriate or a reference to the report of consultations with children. It is important to **explain how the views of children and others were taken into account in the drafting of the GC**.
- Need for **policy coherence** when looking at the impacts of environmental degradation and climate on child rights. While the CRC Committee does not have in its mandate to enforce international environmental agreements and obligations, nor it is its function to rewrite obligations provided for in international environmental agreements, it is compelled to underline the actions needed to protect children from environmental degradation and climate change. The implementation of the CRC and the compliance with international and national environmental regulations must be **mutually supportive**. This needs to be made clear and reflected in the **obligations and measures of implementation**.
- A statement on the importance of addressing **environmental degradation and climate change as intimately related** issues and therefore considering **states obligations in relation to these two, together, and not separately**. There are two main concerns with covering climate change in a separate section: a) the document becomes repetitive – many of the challenges posed by environmental degradation are the same as those resulting from climate change so most **measures to be adopted are the same to address both**. Environmental degradation (biodiversity loss and ecosystem degradation) has dramatically reduced the capacity of the planet to absorb the levels of greenhouse gas emission which are increasing temperatures to unprecedented levels and affecting and accelerating the process of environmental degradation, creating a vicious cycle.) b) Some of the elements included in the climate change section reflect the status of current negotiations under the UNFCCC on some key elements like loss and damage, which are likely to change in a few years. The concept of loss and damage could be included as specific measure under Access to Justice and remedies and/or in International cooperation. Linking climate finance to investment in child rights, explaining how to ensure child participation in the development of adaptation plans (e.g. focusing on creating resilient and child-sensitive systems), listening to children’s calls on mitigation targets are some of the clear links without entering specific areas of work within the UNFCCC. These are areas the committee is fully entitled to include in their review of States under the CRC. Because the GC’s focus is on climate change, a section within or after the Introduction explaining why this focus and its particularities could be included, clearly highlighting the links with child rights.
- An explanation of the connection between the **multilateral environmental agreements, including the international climate regime, and the Convention**.

**Section A: “A Rights-based approach”** this section should clearly describe what a child rights-based approach to climate and environmental measures is and integrate with state obligations.

**Section B: “The evolution of international human rights law and the environment”**

- **The title and content of this section should include reference to the vast body of international, regional and national environmental law. It should be stated that** the GC takes into account and builds on progressive UN legal and policy developments in the area of human rights and the environment (treaties, policy documents including general comments, concluding observations, resolutions and reports from treaty bodies, charter bodies including special rapporteurs). It is important to mention CRC **concluding observations** and [HRC resolution 45/30](#) which recognizes already **children’s rights to a healthy environment** and has recommendations of direct relevance to this GC’s content (right to information, participation, health, international cooperation, role of treaty bodies, role of businesses, access to justice, etc.). Consider adding an annex with a list of relevant environment and human rights sources.

## COMMENTS ON KEY CONCEPTS

This section is useful to explain concepts that are at the basis of the text of the GC. It is also useful to introduce jargon emanating from the child rights and environment area of work.

Save the children welcomes the concepts introduced in this section and makes the following suggestions for its enhancement:

- Under **“Sustainable Development”** it is important to introduce its definition as originally coined in the **1987 Brundtland Report: sustainable development** is "development that meets the **needs of the present generation** without compromising the ability of **future generations** to meet their own needs". This definition makes clearer the intergenerational aspect of development, which is then further explained in the following key concept on **“Intergenerational equity.”** If space permits, reference to the Sustainable Development Goals as the practical road map of the implementation of the concept of sustainable development for the period 2015-2030 could be mentioned. The SDGs framework is also the practical expression of how the three pillars (economic, social and environmental) of development are interlinked, all this having direct impact on child rights. The content of this section on **“sustainable development”** could also be moved as part of the introduction to part B where clearer reference could be made to the SDGs/agenda 2030 as a relevant policy framework for this GC.
- The inclusion of **“Best available science”** under this section is most welcome. After the first sentence it would be useful to add that the present GC is based on the best available science **as of the time when the document was developed** and recognizing that science on the impact of environmental degradation and climate change is ever evolving. When the evidence is not conclusive, the precautionary principle should apply, taking into account the best interest of the child. After this sentence there is no need for a separate reference of the precautionary principle because the bulk of the GC is addressing evidence that shows **actual demonstrated impact**. It is imperative to **include that evidence under each right**, even if it is dated of the time of drafting (see below suggestions of evidence). In order to demonstrate that the GC was drafted based in the best available science, key statistical information should be included throughout the GC, particularly within each relevant right.
- Include the concepts of **Climate Resilience, anticipatory/preventive action and Disaster Risk Reduction** as underpinning **action to be taken by States** to protect children from environmental degradation and climate change. These concepts should underpin all measures that States must take, particularly for all child rights violated or undermined through environmental degradation and climate change. It is essential to call on governments to establish **early warning systems**

**and design resilient food, health and education systems.** Modalities such as mobile health services to ensure access during emergency are already being discussed by States and would be important to consider them in the context of child protection from environmental degradation and climate change. Obligations and measures proposed should pass the “resilience” test. An example is the concept of shock-responsive social protection. These types of measures enhance or are closely related to climate adaptation.

- Include the concept of **climate justice** as it is closely related with human/child rights as well as to the concept of intergenerational equity. Climate justice is also at the core of loss and damage discussions. The UNICEF report is useful in this regard:  
<https://www.unicef.org/globalinsight/media/2866/file>

### **COMMENTS ON *SPECIFIC RIGHTS OF THE CONVENTION AS THEY RELATE TO THE ENVIRONMENT***

**Structure and focus of this section: firstly, the title is misleading as environmental degradation and climate change** has an impact on **all child rights** as stated above. For example, the right to a nationality, including birth registration, which might not be fulfilled because of e.g. climate-induced displacement. Instead of covering all in each right under the convention and risk omissions such as the example, it is suggested to group rights according to how they relate to environment and the obligations of states that address several rights. We therefore recommend to follow the following structure to cover rights and obligations in an integrated manner:

**Guiding principles and rights:**

Non-discrimination

Best Interest of the Child (with mention of CRIA as per General comment No. 14 on the right of the child to have his or her best interests taken as a primary consideration (art. 3, para. 1)

Right to life, survival and development (keeping this right as one, not separating life and survival from development)

Right of the child to be heard (General comment 12 – the right of the child to be heard)

Nature and scope of States obligations with respect to rights and principles mentioned above

**Child rights violated and undermined by environmental degradation and climate change**

Right to life, survival and development (make cross reference to the above section without repeating the text)

Right to health (General comment No. 15 (2013) on the right of the child to the enjoyment of the highest attainable standard of health (art. 24), with particular reference to section on environmental pollution)

Right to standard of living

Right to food

Right to play (General comment No. 17 (2013) on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (art. 31), in particular sections on Unsafe and hazardous environments and access to nature)

Nature and scope of States obligations to respect, protect and fulfill the rights mentioned above

**Children's civil and political rights and other child rights related to children empowerment**

Right to education (refer to General comment No. 1: The Aims of Education)

Right to freedom of expression

Right to association and peaceful assembly

Access to justice and remedies

Access to information

Nature and scope of States obligations to respect, protect and fulfill the rights mentioned above

**General measures of Implementation (UNCRC general comment #5)**

Legal admin and procedural measures....to implement the rights as they relate to environment and climate change

Data collection

CRIA

Business

International Cooperation + Public investment in children+ Collaboration across ministries and between national and local government

**Merge rights and obligations sections:** section III Specific rights in the convention as they relate to the environment is merely descriptive. We suggest merging it with section V which is the core of the GC: obligations of states and how to interpret and implement the convention. Right by right description is repetitive because the main obligations will be the same to address several rights: for life, survival and development, health, standard of living, there will be obligations that apply to all of them such as control pollution, establish appropriate waste management systems etc. The cluster **Child rights violated and undermined by environmental degradation and climate change** should be considered as a continuum with the same policies, legislations and measures addressing the negative impact of environmental degradation and climate change on them.

**Maintaining the 4 general principles of the Convention:** the four guiding principles of the Convention guide the interpretation and implementation of the other articles covering all child rights. These general principles have been the basis of much literature and studies published on child rights and have guided judges at national level since their recognition as such. In addition, other GCs have recognized the 4 principles as pivotal for the interpretation and implementation of the Convention. Civil society organizations have developed training materials on child rights using the concept of the 4 guiding principles. With respect to child rights and environment and climate change, these are particularly relevant.

#### **COMMENTS ON EACH CHILD RIGHT SEPARATELY:**

##### **Under the proposed four general principles section we suggest the following changes for each of them:**

**The principle of Non-discrimination:** propose replacing paragraph 50 with “Certain groups of children from equity-seeking communities, face higher risks to the negative impact of environmental degradation and climate change due to multiple and intersecting forms of discrimination based on, inter alia, race, ethnicity, geography, socio-economic or legal status, and housing. These groups include for example, girls, children with disabilities, Indigenous children, children of minority groups, children of peasants, children in rural communities or living in urban slums and informal settlements, children discriminated against on the basis of on their sexual orientation, gender identity and expression (SOGIE), children living or working in hazardous, contaminated, disaster-prone and/or climate-vulnerable environments, children living in poverty, children in street situations, children of nomadic groups, children living in coastal vulnerable areas, children living in small island states, children in situations of conflict or humanitarian disaster, and refugee, migrant and internally displaced children and those who experience intersecting and compounding forms of discrimination and marginalization.”

**The principle of “Best interests of the child”:** The principle of the best interest of the child is at the basis of a child-rights based approach. That is, every decision that States are to make that have an impact on the environment, must go through a child rights impact assessment (CRIA), by giving primary consideration to the best interest of the child and ensuring that the child right to a clean, healthy and sustainable environment is respected, protected and fulfilled. This principle should be applied in two dimensions and should be differentiated: Assessing best interests in environmental decisions and embedding environmental considerations into best-interests assessments on other policies, notably economic and social policies. The document should include in this section the paragraphs 87-89 on child



rights impact assessment, with the modifications proposed by the track changes document. Consideration of children's views is the basis for determining best interests of the child, particularly when considering policies and actions related to economic development.

**The principle and right to life, survival and development:** we recommend not to separate right to life and survival and treat them as a continuum together with the other rights in the cluster as shown in the text box. It is important to clearly state that children's inherent **right to life** is under serious threat in light of the current levels of environmental degradation and devastating impacts of climate change, as evidence shows. It is imperative that the GC clearly states that children's **survival and development** can only be secured if natural resources and the vital functions of the planet are preserved, that is, if that development is sustainable. In this context, child rights impact assessments on government decisions related to development must be part of a child-rights based approach, taking into account the principles of non-discrimination and the right to be heard, as per the Convention.

**The principle of children's right to be heard:** we suggest to make reference to GC 12 with specific additions related to the theme of this GC as follows: a) make cross-reference to child participation in the proposed section below on internal governance (participation of children in inter-ministerial decision making processes) b) make emphasis on the need for measures to protect children who are environmental rights defenders (protection against the risk of backlash, intimidation and threats) and children working on environmental and climate projects at national and local levels.

**Under the proposed section on child rights violated and undermined by environmental degradation and climate change, we propose the following for each:**

**Right to health:** in addition to the existing text, it is also important to make the link in this section between environmental degradation and increasingly emergence/occurrence of new forms of zoonotic diseases and the transboundary risks that children face everywhere as exemplified by the covid-19 pandemic

**Right to food:** all reference to the right to food should be gathered either under one section on the right to food or a section as a cluster, as shown in text box above. Text proposed: the effects of environmental degradation and climate change on food systems put children in a situation of food insecurity and lead to malnutrition. (An example as of 2023 is the situation of famine in Somalia resulting from drought). For [Indigenous children in many Indigenous Peoples' communities, the effects of climate change](#), as well as the expansion of extractive industries, put their ecosystems under stress, which their families are dependent on to support their needs for food, nutrition, and well-being.

**Right to play:** paragraph 45 is very general and not so clear. It could be shortened and refer to **GC on right to play instead**, particularly sections on Unsafe and hazardous environments and access to nature.

**Under the proposed section on child civil and political rights and rights related to children empowerment, we propose the following for each:**

**Right to education:** we recommend that this section makes clear that this right falls under the two categories: a right that is affected **negatively** by environmental degradation and climate change, depriving children from going to school; and a right that can help **positively** as, through its fulfillment, it empowers children to act as agents of change and can be part of the measures of protection of children

from environmental degradation and climate change. Both aspects are included in the current text but, for better comprehension, it could be rearranged under these two aspects. In relation to the right to education as negatively affected by environment degradation and climate change, the following could be included: “Intense heat has significant impact on educational attainment, with students showing lower learning outcomes during hot school years compared to cooler school years: research suggests that each degree Fahrenheit increase in temperature throughout a school year reduces the amount learned that year. Heat exposure exacerbates inequalities, with students from lower-income homes more likely to live in areas impacted by heat, and less likely to benefit from mitigations such as air-conditioning. Air pollution from fuel burning and other emissions also has immediate impacts. Students moving into schools downwind of highways experience decreases in test scores, more behavioral incidents, and more absences relative to those transitioning upwind of the same pollution source. Working memory development of children exposed to 20% more nitrogen dioxide than their peers would be delayed by around three weeks per year.

As per the **positive** role that the area of education can play in environmental degradation, emphasis could be made on the fact that in times of crisis, schools provide for a critical platform for delivering health services, information, psychosocial support and protection from increased risks of violence, abuse, neglect and exploitation. In terms of empowering children, environmental education is of paramount importance and need to be part of global curriculum as also highlighted by [UNESCO to be part of core curriculum component in 2025](#)

**Right to access to information:** should be considered together with right to be heard and participation. In addition to referencing the GC 12 on child participation for the issue of access to appropriate information by children, specific reference should be made to States obligation to make information related **early warning systems**, and information related to **disaster management** before, during and after the emergency. States should also **protect children from misinformation** such as climate denial and promulgation of similar harmful views, materials and content that undermine urgently needed climate action.

**Right to freedom of expression association and peaceful assembly:** paragraph **61 on climate justice** is too general and may be repetitive with sections I and K. It could be deleted. It is important to refer to the role of civil society organisations and civic space. Without them there would not be meaningful child participation. The Committee should give a strong message about protection of **child environmental defenders** [in light of the alarming increasing numbers of killings \(four defenders have been killed every week since December 2015](#) While the cases of children being killed seems to remain small (data not available), adults killed usually work with children as educators or caregivers holding the cause of environmental conservation, “defending tomorrow” for children.

**COMMENTS ON GENERAL OBLIGATIONS OF STATES UNDER EACH CLUSTER:** as shown in the text box, we propose to include concrete obligations of states addressing the respect, protection and fulfilment of each cluster because the bulk of measures needed, address the group of rights equally. The draft GC presents many of these measures in different places, so it is proposed to group them under each group of principles and rights.

The [attached document with track changes](#) puts forward several measures addressing specific challenges that could be included.

## **PROPOSAL FOR A NEW SEPARATE SECTION ON GENERAL MEASURES OF IMPLEMENTATION:**

It is important to clearly describe what is expected from States to respect, protect and fulfill the child right to a clean, healthy and sustainable environment particularly under the section **General Measures of Implementation**. This is currently weak and scattered in the document (e.g.: integration in law and policy is well covered across, in development cooperation (§94-96), data collection §81, CRSA §87-89; Child rights and business §90-93). It is essential to have a section on **governance and coordination** underlining the need for inter-ministerial and cross-sectoral coordination. The mechanisms for the government working with civil society and children should be included in this section.

**Public investment in children** is also spread through the document and not linked to climate finance, etc. **Child Rights Impact Assessment (CRIA)** is mentioned in many places and sometimes replaced or alongside due diligence. We recommend to explore ways to be more systematic about it and gather all considerations under each cluster of rights as proposed in the text box and/or in a specific section under Other/General measures of implementation, making reference to other paragraphs as appropriate.

Environmental challenges are still not well known outside the environmental community and ministries of environment. An important measure should be on **training, education, and awareness raising** of the impacts of environmental degradation and climate change on child rights to all the sectors of government, society and children themselves (covered in right to education).

**Children's rights and business sector** is covered in 2 sections (one specific on Climate). As the obligations of states are similar, they should be merged into one section and become one stand-alone section given its importance and particularities. Reference to the *GC on State obligations regarding the impact of the business sector on children's rights* could be made using some of its language. Specifically relevant for this GC is the risk of business developing projects and initiatives labeled as "environmentally friendly" or "green" while they result in child rights abuse such as child labor, exclusion from land, disruption of access to natural resources, as well as violations to the child's right to a clean, healthy and sustainable environment.

**International cooperation:** could merge section on international cooperation with that on climate finance or make sure they are complementary.

## **PROPOSAL FOR A NEW SEPARATE SECTION ON STATES OBLIGATIONS IN RELATION TO SPECIAL GROUPS OF CHILDREN AND CHILDREN IN SPECIAL CIRCUMSTANCES**

**We propose adding a section with the above title, which would include:**

**The right of Indigenous children:** we recommend that reference to the General Comment 11 on Indigenous children and their rights under the Convention be made, highlighting that the main principles and obligations included in that GC should apply in the contexts described in this GC. GC 11 does not cover important elements like Free, Prior Informed Consent and elements related to the right of Indigenous children to a clean, healthy and sustainable environment. Some language in this respect is included in the attached document with track changes.

**The right of children on the move:** it is essential that the GC states clearly that there is a trend of increased displacement of children resulting from natural disasters caused by environmental degradation and climate change. 23.7 million people were internally displaced in 2021 as a result of

climate related disasters (IDMC data). [Globally, an estimated 1 billion children live in areas at extremely high](#) risk of flooding, severe drought, or other climate threats that pose a serious risk to lives and livelihoods. Displacement increases the vulnerability of children to the violation of their rights. Obligations and measures of implementation related to this are included in a scattered manner throughout the GC. Given the special characteristics of children on the move (internally displaced, migrants and refugees), we recommend to group them under a separate section.