



February 14, 2023

Dear United Nations Committee on the Rights of the Child,

I am writing on behalf of the American Psychological Association (APA) to provide input into the draft General Comment on children's rights and the environment with a special focus on climate change. We commend your Committee for its tremendous work promoting and protecting the rights of children and are especially grateful for your leadership in highlighting children's rights in the context of climate change.

APA is a leading scientific and professional organization representing psychology, comprising a membership of more than 146,000 clinicians, researchers, educators, practitioners, consultants, and students across the United States and around the world. We work to advance the creation, communication, and application of psychological knowledge to benefit society and improve lives. Since 2000, APA has held special consultative status with the Economic and Social Council (ECOSOC) and has been associated with the Department of Global Communications (DGC). APA has active teams of volunteer psychologists advocating at the United Nations in New York and Geneva, the latter in collaboration with the European Federation of Psychologists' Associations and the Federation of Swiss Psychologists.

APA's governing Council of Representatives has passed Resolutions affirming psychologists' role in addressing global climate change,¹ supporting the Convention of the Rights of the Child,² and affirming the interconnectedness of psychology and human rights.³ We note that the intrinsically international and intergenerational effects of greenhouse gas emissions, wherever they occur, support the General Comment's emphasis on the effects of climate-related loss and damage.

We welcome the opportunity to provide input into this draft General Comment based on psychological science and Association policies.

¹ American Psychological Association. (2022). *Resolution on affirming psychologists' role in addressing global climate change*. <https://www.apa.org/about/policy/climate-change>

² American Psychological Association. (2001). *Resolution on UN convention on the rights of the child and the convention's optional protocols*. <https://www.apa.org/about/policy/rights-child-2001>

³ American Psychological Association. (2021). *Resolution on APA, psychology, and human rights*. <https://www.apa.org/about/policy/resolution-psychology-human-rights.pdf>

750 First Street, NE
Washington, DC 20002-4242
(202) 336-5500
(202) 336-6123 TDD



Please Recycle

www.apa.org

Section III: Specific rights of the Convention as they relate to the environment

Subsection A.2: The right to survival and development

We recommend that Section III, Subsection A.2, reference General Comment #7⁴ to acknowledge the specific needs and opportunities of early childhood.

General Comment #7 describes "the specific features of early childhood that impact on the realization of rights." It underscores the exceptional characteristics of this period in childhood and the vulnerabilities inherent in the earliest years of life, and emphasizes how policies, programs, and practices that nurture the youngest children are fundamental building blocks for each person to reach their potential.⁵ Early childhood is the moment where the highest return is obtained from supportive policies and fiscal investments.⁶

The Nurturing Care Framework shows how daily positive interactions with adult caregivers, along with community and governmental supports, can protect children from the effects of adversity and promote healthy, holistic development.⁷ Nurturing care supports children's psychosocial and cognitive development, physical safety, and health.⁸ For example, a series of longitudinal studies in Jamaica tested the effects of psychosocial stimulation and parental education programs on children experiencing stunting. The children who went through the

⁴ United Nations Committee on the Rights of the Child. (2005). *General Comment #7: Implementing child rights in early childhood*.

<https://www2.ohchr.org/english/bodies/crc/docs/AdvanceVersions/GeneralComment7Rev1.pdf>

⁵ National Research Council (US) and Institute of Medicine (US) Committee on Integrating the Science of Early Childhood Development. (2000). *From neurons to neighborhoods: The science of early childhood development* (J. P. Shonkoff & D. A. Phillips, Eds.). National Academies Press (US).

<https://doi.org/10.17226/9824>

⁶ e.g., Heckman, J. J., & Karapakula, G. (2019). *The Perry Preschoolers at late midlife: A study in design-specific inference* (Working Paper No. 25888). National Bureau of Economic Research.

<https://doi.org/10.3386/w25888>

⁷ World Health Organization, United Nations Children's Fund, & World Bank Group. (2018). *Nurturing care for early childhood development: A framework for helping children survive and thrive to transform health and human potential*. <https://apps.who.int/iris/handle/10665/272603>

⁸ Britto, P. R., Lye, S. J., Proulx, K., Yousafzai, A. K., Matthews, S. G., Vaivada, T., Perez-Escamilla, R., Rao, N., Ip, P., Fernald, L. C. H., MacMillan, H., Hanson, M., Wachs, T. D., Yao, H., Yoshikawa, H., Cerezo, A., Leckman, J. F., Bhutta, Z. A., & Early Childhood Development Interventions Review Group, for the Lancet Early Childhood Development Series Steering Committee. (2017). Nurturing care: Promoting early childhood development. *The Lancet*, 389(10064), 91–102. [https://doi.org/10.1016/S0140-6736\(16\)31390-](https://doi.org/10.1016/S0140-6736(16)31390-3)

programs had higher earnings,⁹ lower rates of violent behavior,¹⁰ and fewer mental health symptoms, physical diseases, disabilities, and fatalities than the control group later in life.¹¹

Climate change highlights the importance of the nurturing care agenda.¹² Programs focused on climate loss and disasters tend to be reactive and remedial rather than proactive and opportunity-driven. Decades of research and program evaluations show that policies and programs focused on prenatal and early childhood development provide a cost-effective and enduring path to boosting human development, impacting families, communities, and nations.¹³

We also recommend that Section III, Subsection A.2 reference family stress and the risk of violence.

Climate change can increase family stress, which plays a vital role in child development. For example, those whose homes are damaged by a flood, storm, or wildfire may need to be relocated multiple times before resettling permanently. For pregnant women, this period of relocation can disrupt prenatal care, including not being able to access their doctors or necessary medicine, thereby impacting fetal development.¹⁴ Parents dealing with the stress of displacement may experience impaired functioning as caregivers, which in turn places increased stress on children.¹⁵ Children may have to attend a new school or miss school altogether, putting them at risk for psychological distress or behavioral issues.¹⁶

⁹ Gertler, P., Heckman, J., Pinto, R., Zanolini, A., Vermeersch, C., Walker, S., Chang, S. M., & Grantham-McGregor, S. (2014). Labor market returns to an early childhood stimulation intervention in Jamaica. *Science*, 344(6187), 998–1001. <https://doi.org/10.1126/science.1251178>

¹⁰ Walker, S. P., Chang, S. M., Vera-Hernández, M., & Grantham-McGregor, S. (2011). Early childhood stimulation benefits adult competence and reduces violent behavior. *Pediatrics*, 127(5), 849–857. <https://doi.org/10.1542/peds.2010-2231>

¹¹ Walker, S. P., Chang, S. M., Powell, C. A., Simonoff, E., & Grantham-McGregor, S. M. (2006). Effects of psychosocial stimulation and dietary supplementation in early childhood on psychosocial functioning in late adolescence: Follow-up of randomised controlled trial. *BMJ*, 333(7566), Article 472. <https://doi.org/10.1136/bmj.38897.555208.2F>

¹² Britto, P. R., Lye, S. J., Proulx, K., Yousafzai, A. K., Matthews, S. G., Vaivada, T., Perez-Escamilla, R., Rao, N., Ip, P., Fernald, L. C. H., MacMillan, H., Hanson, M., Wachs, T. D., Yao, H., Yoshikawa, H., Cerezo, A., Leckman, J. F., Bhutta, Z. A., & Early Childhood Development Interventions Review Group, for the Lancet Early Childhood Development Series Steering Committee. (2017). Nurturing care: Promoting early childhood development. *The Lancet*, 389(10064), 91–102. [https://doi.org/10.1016/S0140-6736\(16\)31390-3](https://doi.org/10.1016/S0140-6736(16)31390-3)

¹³ e.g., National Research Council (US) and Institute of Medicine (US) Committee on Integrating the Science of Early Childhood Development. (2000). *From neurons to neighborhoods: The science of early childhood development* (J. P. Shonkoff & D. A. Phillips, Eds.). National Academies Press (US). <https://doi.org/10.17226/9824>

¹⁴ Kilsztajn, S., Rossbach, A., do Carmo, M. S. N., & Sugahara, G. T. L. (2003). Prenatal care, low birth weight and prematurity in São Paulo State, Brazil, 2000. *Revista De Saude Publica*, 37(3), 303–310. <https://doi.org/10.1590/s0034-89102003000300007>

¹⁵ Pfefferbaum, B., Jacobs, A. K., Van Horn, R. L., & Houston, J. B. (2016). Effects of displacement in children exposed to disasters. *Current Psychiatry Reports*, 18(8), Article 71. <https://doi.org/10.1007/s11920-016-0714-1>

¹⁶ Pfefferbaum, B., Jacobs, A. K., Van Horn, R. L., & Houston, J. B. (2016). Effects of displacement in children exposed to disasters. *Current Psychiatry Reports*, 18(8), Article 71. <https://doi.org/10.1007/s11920-016-0714-1>

We also know that climate-related disasters can increase the risk of violence in the home.¹⁷ A 2021 literature review points to certain conditions that make post-disaster violence against children more likely, including caregiver stress and household economic stress.¹⁸

Subsection B: The right to the highest attainable standard of health: “27. Another concern is children’s current and anticipated psychosocial, emotional, and mental health problems and suffering caused by environmental harm. The link between children’s mental health and environmental harm is increasingly recognized, such as the increasing prevalence of eco-anxiety, and needs further emphasis.”

We recommend that Section III, Subsection B, Paragraph 27, include additional detail on mental health to highlight the robust body of literature and severity of the issue.

There is growing evidence that children are worried about climate change,¹⁹ which itself can be a threat to mental health.²⁰ A survey of 10,000 young people aged 16-25 in ten countries found high proportions expressing concern, negative emotions, and pessimism about the future; 84% were at least moderately worried, and 45% said their worries negatively affected their daily lives.²¹

The General Comment could reference specific conditions. For example, children exposed to higher levels of urban pollution are more likely to develop attention problems and symptoms of anxiety and depression, reduced academic performance,²² and slower cognitive development.²³

¹⁷ Gearhart, S., Perez-Patron, M., Hammond, T. A., Goldberg, D. W., Klein, A., & Horney, J. A. (2018). The impact of natural disasters on domestic violence: An analysis of reports of simple assault in Florida (1999–2007). *Violence and Gender*, 5(2), 87–92. <https://doi.org/10.1089/vio.2017.0077>

Keenan, H. T., Marshall, S. W., Nocera, M. A., & Runyan, D. K. (2004). Increased incidence of inflicted traumatic brain injury in children after a natural disaster. *American Journal of Preventive Medicine*, 26(3), 189–193. <https://doi.org/10.1016/j.amepre.2003.10.023>

¹⁸ Cerna-Turoff, I., Fischer, H.-T., Mansourian, H., & Mayhew, S. (2021). The pathways between natural disasters and violence against children: A systematic review. *BMC Public Health*, 21(1), Article 1249. <https://doi.org/10.1186/s12889-021-11252-3>

¹⁹ Burke, S. E. L., Sanson, A. V., & Van Hoorn, J. (2018). The psychological effects of climate change on children. *Current Psychiatry Reports*, 20(5), Article 35. <https://doi.org/10.1007/s11920-018-0896-9>

²⁰ Clayton, S. (2020). Climate anxiety: Psychological responses to climate change. *Journal of Anxiety Disorders*, 74, Article 102263. <https://doi.org/10.1016/j.janxdis.2020.102263>

²¹ Hickman, C., Marks, E., Pihkala, P., Clayton, S., Lewandowski, R. E., Mayall, E. E., Wray, B., Mellor, C., & Susteren, L. van. (2021). Climate anxiety in children and young people and their beliefs about government responses to climate change: A global survey. *The Lancet Planetary Health*, 5(12), e863–e873. [https://doi.org/10.1016/S2542-5196\(21\)00278-3](https://doi.org/10.1016/S2542-5196(21)00278-3)

²² Perera, F. P., Tang, D., Wang, S., Vishnevetsky, J., Zhang, B., Diaz, D., Camann, D., & Rauh, V. (2012). Prenatal polycyclic aromatic hydrocarbon (PAH) exposure and child behavior at age 6-7 years. *Environmental Health Perspectives*, 120(6), 921–926. <https://doi.org/10.1289/ehp.1104315>

Wang, S., Zhang, J., Zeng, X., Zeng, Y., Wang, S., & Chen, S. (2009). Association of traffic-related air pollution with children’s neurobehavioral functions in Quanzhou, China. *Environmental Health Perspectives*, 117(10), 1612–1618. <https://doi.org/10.1289/ehp.0800023>

²³ Yorifuji, T., Kashima, S., Diez, M. H., Kado, Y., Sanada, S., & Doi, H. (2017). Prenatal exposure to outdoor air pollution and child behavioral problems at school age in Japan. *Environment International*, 99, 192–198. <https://doi.org/10.1016/j.envint.2016.11.016>

Climate impacts may affect the developmental potential and trajectory of children. Research documents that high levels of adversity and stress during childhood, which is associated with experiencing a natural disaster or displacement, can affect the development of neural pathways in ways that impair memory, executive function, and decision-making in later life.²⁴ One study found that experiencing an extreme weather event before age five resulted in higher levels of anxiety and depression among adults.²⁵

Subsection D: The right to adequate standard of living: “44. In situations of cross-border displacement and migration linked to climate- and environment-related events, the Committee underlines the importance of international cooperation and the States’ obligation to undertake all appropriate legislative, administrative and other measures to ensure the rights under the Convention to all children within their jurisdiction without discrimination.”

We recommend that Section III, Subsection D, Paragraph 24, emphasize the risks to mental health and intergroup relations posed by climate-related migration.

APA applauds the Committee for recognizing the risk posed to children’s rights by climate-related displacement and migration. We note that individuals undergoing these experiences may suffer loss or alteration of identity, autonomy, or sense of control.²⁶ The loss of the family unit leaves children at increased risk for abuse and exploitation.²⁷ Further, households, social networks, and communities may see a deleterious impact on cohesiveness and functioning. Communities impacted by major disasters or loss/degradation of homelands are at risk of being collectively traumatized. Many of these impacts threaten human rights as defined by the Universal Declaration of Human Rights and other international agreements, including rights concerning life, health, and culture.²⁸ Migration also disrupts children’s learning and school-based education opportunities, which can be sources of stability in their lives.²⁹

²⁴ Shonkoff, J. P., Garner, A. S., Committee on Psychosocial Aspects of Child and Family Health, Committee on Early Childhood, Adoption, and Dependent Care, & Section on Developmental and Behavioral Pediatrics. (2012). The lifelong effects of early childhood adversity and toxic stress. *Pediatrics*, 129(1), e232-246. <https://doi.org/10.1542/peds.2011-2663>

²⁵ Maclean, J. C., Popovici, I., & French, M. T. (2016). Are natural disasters in early childhood associated with mental health and substance use disorders as an adult? *Social Science & Medicine*, 151, 78–91. <https://doi.org/10.1016/j.socscimed.2016.01.006>

²⁶ American Psychological Association. (2022). *Addressing the climate crisis: An action plan for psychologists*. <https://www.apa.org/science/about/publications/climate-crisis-action-plan.pdf>

²⁷ UNICEF Office of Research. (2020). *The sale and sexual exploitation of children: Migration*. <https://www.unicef-irc.org/publications/1122-the-sale-and-sexual-exploitation-of-children-migration.html>

²⁸ Feygina, I., Chapman, D., & Markowitz, E. (2020). Climate change: A challenge to human rights, justice, equality, and human well-being. In *The Cambridge handbook of psychology and human rights* (pp. 443–458). Cambridge University Press. <https://doi.org/10.1017/9781108348607.031>

United Nations Environment Programme. (2015). *Climate change and human rights*. <https://www.unep.org/resources/report/climate-change-and-human-rights>

²⁹ Masten, A. S., & Narayan, A. J. (2012). Child development in the context of disaster, war, and terrorism: Pathways of risk and resilience. *Annual Review of Psychology*, 63(1), 227–257. <https://doi.org/10.1146/annurev-psych-120710-100356>

Additionally, the social and economic instability brought about by climate change migration activates people's need to protect their groups and ideologies,³⁰ potentially contributing to prejudice, discrimination, and violence against out-groups,³¹ including children. These effects of climate change have already contributed to wide-scale unrest around the globe.

Section V – General obligations of States

Subsection A: The obligation to respect, protect, and fulfill: “81. States should use platforms at all levels to collect and process data with respect to environment-related specifics on children’s rights. States should ensure the collection of reliable and regularly updated and disaggregated data and research on environmental harms, including risks and actual impacts of climate-related harm on children’s rights. They should include longitudinal data on the effects of environmental harm on children’s health and development at different ages. Such data and research should inform the formulation and evaluation of environmental legislation, policies, programmes and plans at all levels, and should be made publicly available.”

We recommend that Section V, Subsection A, Paragraph 81, go into further detail on the type of data collection necessary to ensure that States are able to track and address the harms of climate change on children.

APA appreciates the emphasis on data to inform and evaluate environment-related policies, and programs that affect children. We acknowledge the paucity of good data on climate harms generally³² and related to children in particular.³³

Building on an ecological systems framework,³⁴ psychologists and other health researchers are increasingly adopting a population health view of children’s development to inform measurement.³⁵ This means collecting data not only about children and their families, but also about the social determinants of health and learning. These social determinants include access to safe housing, economic resources, and quality learning environments. A population health

³⁰ Feygina, I., Jost, J. T., & Goldsmith, R. E. (2010). System justification, the denial of global warming, and the possibility of “system-sanctioned change.” *Personality & Social Psychology Bulletin*, 36(3), 326–338. <https://doi.org/10.1177/0146167209351435>

³¹ e.g., Leidner, B., Castano, E., Zaiser, E., & Giner-Sorolla, R. (2010). Ingroup glorification, moral disengagement, and justice in the context of collective violence. *Personality & Social Psychology Bulletin*, 36(8), 1115–1129. <https://doi.org/10.1177/0146167210376391>

³² American Psychological Association. (2022). *Addressing the climate crisis: An action plan for psychologists*. <https://www.apa.org/science/about/publications/climate-crisis-action-plan.pdf>

³³ United Nations Children’s Fund (UNICEF) (2021). *The Climate crisis is a child rights crisis: Introducing the Children’s Climate Risk Index*. <https://www.unicef.org/reports/climate-crisis-child-rights-crisis>

³⁴ Bronfenbrenner, U. (1979) *Ecology of human development: Experiments by nature and design*. Harvard University Press.

³⁵ Evans, A. C., & Bufka, L. F. (2020). The critical need for a population health approach: Addressing the nation’s behavioral health during the COVID-19 pandemic and beyond. *Preventing Chronic Disease*, 17, Article E79. <https://doi.org/10.5888/pcd17.200261>

approach is critical to understanding the impacts of environmental hazards on children's holistic development, encompassing behavioral and physical health and learning.

The cross-sectional and longitudinal data and analyses needed to inform the global community about systems, policy, and practice changes that affect children's health and learning include:

- Responsiveness of child-serving policies and systems of care to climate hazards
- Long-term effects of climate-related harm in children's environments, including at home, in educational settings, and during mass migration
- Compromised health of caregivers and teachers due to exposures to climate-related harms
- Effectiveness of prevention and intervention measures to improve children's health and learning in the face of climate change

However, the COVID-19 pandemic increased the cost of data collection to national statistics offices and reduced government and donor funding. Globally, government funding for data and statistics decreased in 48% of national statistics offices, with funding reductions in more than two-thirds of offices in Sub-Saharan Africa, Latin America and the Caribbean, Northern Africa, and Western Asia.³⁶

This trend must be reversed. States must be able to collect and utilize robust surveillance data and adopt measurement, evaluation, and learning frameworks to disaggregate data by systemic and individual indicators associated with children's health and learning opportunities. This will enable States to track trends and guide efforts to mitigate impacts of climate change on children, supporting their right to health.

Conclusion

I would like to close this letter by reiterating our admiration for the draft General Comment on children's rights and the environment with a special focus on climate change. If governments fulfill the responsibilities outlined, children will be able to develop to their fullest potential amidst the difficult context of our changing climate. Thank you for the opportunity to express support for and offer suggestions on this important General Comment. If APA can provide any further assistance, please contact Gabriel Twose, PhD, Senior International Affairs Officer (gtwose@apa.org) or Dennis Stolle, PhD, Senior Director for Applied Psychology (dstolle@apa.org).

Sincerely,



Jaime L. Diaz-Granados, PhD
Deputy Chief Executive Officer

³⁶ United Nations. (2022). *The sustainable development goals report*.
<https://unstats.un.org/sdgs/report/2022/>