



Committee on the Rights of the Child  
United Nations High Commissioner for Human Rights  
1211 Geneva 10  
Switzerland  
By email to: [registry@ohchr.org](mailto:registry@ohchr.org)

May 20, 2022

**Re: Follow-up to Canadian hearings concerning its obligations under the U.N. Convention on the Rights of the Child**

Dear Madame Chair Mikiko Otani and Dr. Anne Marie Skelton, Lead of the Canada Task Force:

I am providing this update following the closing of the second day of hearings on May 18<sup>th</sup>, especially in connection with answers that the Government of Canada decided to provide in writing after the meeting and out of concern for the fact that the Government of Canada put food-related policies into issue in the final 10 minutes of the final day of hearings after the opportunity for Committee Members to ask further clarifying questions had passed.

These comments [supplement CHSL's April 20, 2022 update to the Committee on the Right of the Child](#), which were also provided on May 10, 2022 in [condensed form to the Canadian House of Commons Standing Committee on Health](#).

My understanding is that your Concluding Observation report, due to be published in early June, will be based on the best available evidence, but that issues must be raised during the hearing to appear in the Final Conclusions.

Committee Vice-Chair and member of the Canada Task Force, Hynd Ayoubi Idrissi, inquired about Canada's approach to addressing food insecurity near the end of the second day of hearings, and the government responded by reference in broad terms to its approach to tackle food insecurity (twice), its National Food Strategy, and the work of its Food Policy Advisory Council.

Furthermore, while CHSL and other civil society organization were invited to provide input on Canada's reports to the Committee, the government did not share drafts. However, all of the issues raised below were acknowledged in writing by the Public Health Agency of Canada to Canadian NGOs in November 2020 as part of its preparations to participate in the Committee on the Rights of the Child's Periodic Review (see attached summary of issues prepared by PHAC in November 2020 for consultation with Canadian NGOs), leading some NGOs to infer that government responses would apprise the Committee of its relevant efforts and future plans.

## 1. National School Food Program

In its response to the question about food security from Committee Vice-Chair and member of the Canada Task Force, Hynd Ayoubi Idrissis, the government cited the National Food Policy. However, other than establishing a fund to finance temporary projects with no expectation of scale-up, the National Food Policy has not progressed since a 2017 consultation. The 2018 *What We Heard Report* of that Ottawa Summit acknowledged several policy concepts and principles, but ***only one*** crystalized recommendation:

*During consultations many specific calls for the implementation of school food programming were made. Participants thought that school nutritional programs could help alleviate food insecurity. As well, it was suggested that provision of meals in schools can help ensure that children eat a sufficient quantity of healthy food, a concern not limited to lower income groups. There were also calls for revised school lunch guidelines, including ensuring students have enough time to eat.<sup>1</sup>*

Likewise, according to the [Canadian Food Policy Advisory Council's minutes](#), advice about a national school food program was offered and updated at each of the four substantive meetings since its first inception meeting in March 2021, the only true food security proposal.

UNICEF, the 190-group [Canadian Coalition for Healthy School Food](#), and the [Centre for Health Science and Law](#) are among 65 civil society and intergovernmental organizations, and 63 national governments, as well as the African Union and European Union that support the [global School Meals Coalition](#). Canada is not yet among them and, as indicated in CHSL's submission, Canada has promised three times since 2019 to establish a national school food program, the last to implement a program among G-7 countries. In its most recent pledge, the federal government's budget plan failed to appropriate funds (\$200 million promised for the current fiscal year promised in its 2021 election platform) and signalled a preference for a stigma-inducing means-tested approach which the Coalition has strenuously opposed because no child should have to choose between feeling hungry or ashamed. Instead, the Coalition and CHSL urge the implementation of a universal school food program (without shame- and stigma-inducing means-testing) focussed on environmentally sustainable foods, with robust conflict-of-interest safeguards, and integrated with nutrition education curriculum.

## 2. Restricting Advertising Directed at Children

The transcript of the first hour of House of Commons debate on [Bill C-252, The Child Health Protection Act](#)—which appears to be informed by federal government analysis and was introduced by a government Member of Parliament—confirmed her intention to define “child” as a person aged 0-13 years of age, not zero to 18 as recommended by the *Convention on the Rights of the Child* and all provinces and territories that do not mark the end of childhood at 19. The [Minister of Health has not yet acted on his 2021 mandate to restrict food advertising to children](#). One of the speakers

By close contrast, in the government's justification to the Committee this week for its failure to prohibit corporal punishment of children under the *Criminal Code of Canada*, the federal government gives the misleading impression that it is bound by the decision of the Supreme Court of Canada. The Court did not oblige the government to authorize violence against children by persons in authority.<sup>2</sup> In partially denying the remedy the Foundation for Children, Youth and the Law sought, the Supreme Court deferred to the Government's authority to criminalize conduct.

Furthermore, the same source of data from which the bill-sponsor drew her assessments of the economic burden of poor diet (\$13 billion per year<sup>3</sup>) and the number of premature deaths attributable to poor diet (36,000 per year), indicates that excess sugar, salt, and saturated fat (insufficient polyunsaturated fat) are responsible for only approximately 20% of diet-related disease (approximately 7,000 deaths).<sup>4</sup> Although much diet-related disease is due to under-consumption of fruits, vegetables, and legumes, the silence of the bill's reference to whole and refined grains (cause of more than 9,000 deaths alone) assures the nutritional standard's failure to square policy of which foods to avoid, though these data may under-estimate the impact of high-sodium diets (a matter than is currently under review by the IHME).

The failure of Canada to fully address this is inconsistent with CRC General Comment Number 4, paragraph 25, which states:

*25. The Committee is concerned about the influence exerted on adolescent health behaviours by the marketing of unhealthy products and lifestyles. In line with article 17 of the Convention, States parties are urged to protect adolescents from information that is harmful to their health and development, while underscoring their right to information and material from diverse national and international sources. States parties are therefore urged to regulate or prohibit information on and marketing of substances such as alcohol and tobacco, particularly when it targets children and adolescents.*<sup>5</sup>

In the context of marketing more specifically, the Committee on the Rights of the Child has called on States to review policies concerning the commercialization of toys and games to children, including through children's television programmes and directly related advertisements.<sup>6</sup>

Will future regulatory restrictions on advertising to children protect teenagers or just children to age 12? And what will the governments of Canada do (especially the federal government) do to ensure that—like Quebec's general prohibition on all advertising to children—a nutrition-based restriction will prohibit advertisements for, as examples, restaurants, fast food outlets, and soft drinks logos that do not specifically mention products that are high fat, sugar, and salt, but clearly promote their consumption?

### **3. Advertising and Promotion of Breast-milk Substitutes**

Canada has supported the 1981 WHO [\*International Code of Marketing of Breast-milk Substitutes\*](#) and 18 subsequent relevant resolutions of the World Health Assembly, without exception, in that international forum, but has utterly failed to fulfill its obligations with domestic implementing legislation or regulations. UNICEF and WHO maintain that restrictions on the marketing of

breastmilk substitutes are important safeguards of child rights.<sup>7</sup> Likewise, the Committee on the Rights of the Child has recognized the *Code* as an appropriate measure that states parties to the *Convention on the Rights of the Child* are obliged to take to fulfil their obligations under the *Convention*.<sup>8</sup>

As the Committee is likely aware, the most recent biennial status report on the WHO *International Code of Marketing of Breast-milk Substitutes* implementation was published earlier this month by UNICEF, the World Health Organization, and the International Baby Food Action Network. Its appraisal of Canada's implementation has remained the same since 1981: no implementation whatsoever. The *Marketing of Breast-milk Substitutes National implementation of the International Code Status Report 2022* indicates the Canada is tied for the worst track record in the world. It designated Canadian laws as having "no legal measures in place" to curb the advertising and promotion abuses that the *International Code* aims to prevent. Canada shares this ignoble distinction with only three of 36 (rich) OECD countries: the United States, Israel and Japan.<sup>9</sup>

After the April 20, 2022 deadline passed for submitting updated comments to the Committee, a massive food-safety related recall of powdered infant formula manufactured by U.S.-based Abbott Nutrition caused critical shortage of infant formula in the United States. The shortage was so grave, it prompt President Joe Biden to invoke the *Defense Production Act* to mobilize military transport planes to airlift infant formula supplies from Europe and the U.S. Food and Drug Administration to expedite regulatory approval for formula manufacturer to meet European regulations. U.S. supply disruptions also triggered a shortage of certain types of formula made with hypoallergenic ingredients in Canada. (Canada obtains the vast majority of its infant formula supply from U.S.-based manufacturers.) Likewise, although nearly all of [6 million kilograms per year of infant formula imported into the Ukraine come from Poland, Germany, Netherlands, France, and Switzerland](#), the displacement of people due to the war in the Ukraine has exacerbated disruptions in global supply chains.

All three countries have very low rates of exclusive breastfeeding and, as noted in UNICEF's May 2022 status report, have correspondingly few regulatory limits on advertising and promotion of breastmilk substitutes.

There is an urgent need and opportunity for the Committee on the Rights of the Child to advise:

- the government of Canada,
- the House of Commons Standing Committee on Health through CHSL's future testimony, and
- new mothers through whatever news media it attracts

that, especially in times of interruptions in food supply chains caused by war, bacterial contamination, and other crises, the most reliable, safest, and least expensive source of nutrition for babies is mothers' milk, not infant formula. While resuming the lactation process is challenging after formula-feeding, it is possible in many cases.<sup>10</sup>

Mothers can eat lots of foods with many nutritious substitutes, but babies that become dependent on a single, specialize food product—especially a substitute with such a poor track record for safety—are at higher risk of serious health jeopardy if that product becomes unavailable, even temporarily. As stressed in our previous submissions to the Committee, according to World Health Organization experts, every year, sub-optimal breastfeeding leads to the deaths of approximately 823,000 babies worldwide especially due to diarrhea and respiratory infections, and more than 20,000 mothers due to breast cancer,<sup>11</sup> nearly double the 420,000 deaths caused by all other food-borne pathogens in people of all ages.<sup>12</sup>

Apart from biennial survey reports from UNICEF and decennial report from this Committee, impactful comments on the human rights abuses by formula companies in Canada and inaction by Canadian governments are few and far between.

#### **4. Children’s rights to a healthy environment: the combined deleterious impact of breastmilk substitutes on greenhouse gas emissions**

In response to Dr. Skelton’s query and the government’s response to concerns about Canada’s protection of children’s rights in relation to climate change, CHSL is sharing the following comments that were included in its submission to the Government of Canada on April 14, 2022 to inform its position on a [proposed global standard for sustainability labelling of food products](#) that concern both infant formula and greenhouse gas emissions (which is manufactured from cow’s milk).

*As the Government of Canada and Prime Minister Trudeau so often assert, climate change is pressing global threat that requires urgent corrective action. According to the Liberal Government’s 2021 Liberal election platform (at page 42), Greenhouse Gas emissions from the oil and gas sector have risen since 2005 to comprise 26% of Canada’s total emissions, making it the largest emitting sector in Canada.<sup>13</sup> The election platform was silent on the contribution of food systems or livestock to climate change.*

*However, the United Nations Intergovernmental Panel on Climate Change (IPCC) estimates that 21–37% of total global greenhouse gas (GHG) emissions are attributable to food systems and that climate change will have important negative impacts on food security.<sup>14</sup> The food system rivals the energy sector for contributions to greenhouse gas emissions according to the IPCC, which contributed 35% of GHGs in 2010.<sup>15</sup>*

*However, a recent study conducted by researchers at Johns Hopkins University and New York University concluded that the conventional method for calculating methane gas contributions by livestock underestimate its impact on climate in high-income countries like Canada and the United States to the extent the true methane contributions of meat and dairy production may be 39% to 90% higher.<sup>16</sup> Methane accounts for 14% of total global greenhouse gas emissions and is 67 times more potent than CO<sub>2</sub> in temperature change potential after 20 years according to the UN IPCC.<sup>17</sup> The EAT-Lancet Commission stressed that there is an urgent need to mandate eco-*

*labelling on food products to help reduce the environmental impact of food systems, particularly Greenhouse Gas Emissions, which seems more urgent<sup>18</sup> than the tentative commitment to “to explore possible work on sustainability labelling within the mandate of CCFL” referenced in the Circular Letter.*

*Fortunately, there is great potential for improvement. A 2016 systematic review found that of 14 common sustainable dietary patterns across reviewed studies, reductions in greenhouse gas emissions from food by as much as 70-80% is possible by adopting sustainable dietary patterns and that reductions in environmental footprints were generally proportional to the magnitude of animal-based food restriction. Dietary shifts modelled also yielded modest benefits in all-cause mortality risk.<sup>19</sup>*

## **5. Justiciability of children against human rights abuses by corporations**

I am not privy to the written submission that the Committee received, presumably today, from the government of Canada in response to questions about how children’s rights are protected from abuses by businesses if the [Canadian Ombudsperson for Responsible Enterprise \(CORE\)](#) is only mandated to investigate Canadian companies’ conduct abroad. However, I note that the government overstates the viability and reach of redress available through children’s lawyers, human rights tribunals, and legal aid services greatly exaggerate the availability of redress. For instance, even the [Ontario Office of the Children’s Lawyer](#), with an unmatched mandate, nationally, serves only 8,000 clients per year with an average of approximately two days of legal services each. [Provincial](#) and [federal human rights commissions](#) address claims of inequality only, not the myriad of measures contemplated by the *Convention* which has not been comprehensively domestically implemented. Legal aid is generally only available for criminal and some sometimes family law matters to [very low-income Canadians](#), e.g., families supported by a single minimum wage or lower income. There are very few lawyers that provide dedicated legal services for children without fees; for instance, the Toronto-based Justice for Children and Youth is the only specialized legal clinic in Ontario with six lawyers serving a population of 3 million children living in an area of 1 million km<sup>2</sup>.

These responses reflect a concern raised in the written submission to the [Committee by the New Brunswick Children and Youth Advocate \(at page 4\)](#) about fundamental problems with the justiciability of rights by children for lack on implementation of the *Convention* and poor access to affordable legal services. When governments primarily rely on children to enforce child protection law by retaining expensive legal counsel in the private market, it is largely a child-beware approach to child protection, similar to consumer protection systems that rely on consumers to prosecute health, safety, and fraud laws. As with some of the Canadian government’s claims, they would be more fairly presented by quantification of the reach of available resources, than the mere declaration of their availability.

Furthermore, the Canadian government [appears to have backed a U.S. government proposal to scrap the product of several years of negotiations](#) on a “[Legally binding instrument to regulate, in international human rights law, the activities of transnational corporations and other business enterprises.](#)” To be clear, Canada does [not require businesses to conduct human rights "due diligence"](#) to ensure that their supply chains inside and outside of the countries where they operate

respect human rights law, as the [many European Union](#) countries do and as the [European Commission proposed a draft directive](#) urged all member states to do in February 2022 further to a March 2021 [European Union Parliament resolution](#).

## **6. Child Rights Impact Assessment Policy Tool and Course**

In November 2020, the federal Department of Justice began developing a Child Rights Impact Assessment tool and course in consultation with 13 experts and representatives of civil society organizations, including myself. UNICEF and this Committee have championed the development and use of such a tool for many years. By March 2022, the government's draft appeared to be nearly finalized, but was not mentioned in Canadian written or oral communications to the Committee (to my knowledge).

General Comment No. 5 of the Committee on the Rights of the Child stressed the importance of child rights impact assessments as follows:

***E. Monitoring implementation - the need for child impact assessment and evaluation***

*45. Ensuring that the best interests of the child are a primary consideration in all actions concerning children (art. 3 (1)), and that all the provisions of the Convention are respected in legislation and policy development and delivery at all levels of government demands a continuous process of child impact assessment (predicting the impact of any proposed law, policy or budgetary allocation which affects children and the enjoyment of their rights) and child impact evaluation (evaluating the actual impact of implementation). This process needs to be built into government at all levels and as early as possible in the development of policy.<sup>20</sup>*

While the federal Department of Justice plainly is considering Child Rights Impact Assessments, its degree of commitment to apply this tool to federal spending and regulatory decisions and using its good offices to promote use by provincial governments is unclear. Likewise, its commitment to adapting the on-line course to suit curriculum for Canada's 5 million school children has great potential, but is in doubt.

Respectfully submitted,



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## References

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<sup>1</sup> Agriculture and Agri-food Canada. *What We Heard: Consultations on a Food Policy for Canada*. October 2018. Available at: <https://agriculture.canada.ca/sites/default/files/legacy/pack/pdf/20181025-en.pdf>

<sup>2</sup> In partially denying the remedy sought by the Foundation *Canadian Foundation for Children, Youth and the Law v. Canada (Attorney General)*, the Supreme Court deferred to the government’s authority to criminalize conduct. It did not require the government to authorize violence against children by persons in authority. It rejected a child-rights organization’s argument that the courts should overturn that law on the grounds that it is contrary to general principles of constitutional law informed by international human rights law. It is absurd to interpret this ruling as the Court requiring the government to authorize persons in authority to assault children. [Section 43 of the Criminal Code of Canada is entitled “Protection of Persons in Authority, Correction of Children by Force”](#) seems to be directly opposite to Canada’s undertaking as a state party to the *Convention of the Rights of the Child* (namely, to protect children, not to protect the adults entrusted with fiduciary authority over children). If Canada criminalized assault on children aged 2-12 by people in positions of authority, the Supreme Court would likely exhibit similar deference to government, especially 18 years later as approaches to parenting have evolved. See: *Canadian Foundation for Children, Youth and the Law v. Canada (Attorney General)*, 2004 SCC 4 (CanLII), [2004] 1 SCR 76, <<https://canlii.ca/t/1g990>>

<sup>3</sup> Lieffers JRL, Ekwaru JP, Ohinmaa A, Veugelers PJ. The economic burden of not meeting food recommendations in Canada: The cost of doing nothing. *PLoS One*. 2018 Apr 27;13(4):e0196333. doi: 10.1371/journal.pone.0196333. PMID: 29702680; PMCID: PMC5922758. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5922758/pdf/pone.0196333.pdf>

<sup>4</sup> Institute for Health Metrics and Evaluation. Global Burden of Disease database. 2019. See: <https://vizhub.healthdata.org/gbd-results?params=gbd-api-2019-permalink/eb9c83035a4ff09e41d73ace5551ce70>

<sup>5</sup> General Comment No.4 Adolescent Health and Development (CRC/GC/2003/4), paragraph 27 at page 27. Available at: <https://www.unicef-irc.org/publications/pdf/crcgencommen.pdf>

<sup>6</sup> General Comment No. 17 (2013) on the right of the child to rest, leisure, play, recreational activities, cultural life and the arts (art.31) at Part VIII (8).

<sup>7</sup> Grummer-Strawn LM, Zehner E, Stahlhofer M, Lutter C, Clark D, Sterken E, Harutyunyan S, Ransom EI; WHO/UNICEF NetCode. New World Health Organization guidance helps protect breastfeeding as a human right. *Maternal and Child Nutrition*. 2017 Oct;13(4):e12491. doi: 10.1111/mcn.12491. Epub 2017 Aug 10. PMID: 28795484; PMCID: PMC5638108. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5638108/pdf/MCN-13-e12491.pdf>

<sup>8</sup> Implementation Handbook for the Convention on the Rights of the Child, Third Edition, United Nations Children’s Fund, 2017, page 360. Available at: <https://apps.who.int/iris/rest/bitstreams/1275995/retrieve> and see: UNICEF, *International Trade Agreements and Implementation of the International Code of Marketing of Breast-Milk Substitutes: Frequently Asked Questions*. New York, 202: Available at: <https://apps.who.int/iris/rest/bitstreams/1275995/retrieve>

<sup>9</sup> UNICEF, WHO and the International Baby Food Action Network. *Marketing of breast-milk substitutes: National implementation of the International Code Status report 2022*. UNICEF, New York. May 2022. Available at: <https://www.unicef.org/media/120071/file/Marketing%20of%20Breast%E2%80%91milk%20Substitutes%20Status%20Report%202022.pdf> The 2022 report corrected a misclassification of Australia and New Zealand that elevated their scores.

<sup>10</sup> See for example, Le Leche League International. *Resuming Breastfeeding After an Interruption*. Available at: <https://www.llli.org/breastfeeding-info/relactation/> And see, generally: UNICEF, et al. *Joint Statement Protecting Infant and Young Child Feeding Practices in the Ukraine Conflict and Refugee Crisis Version 2: May 2022*. Available

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at: [https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/iycf\\_joint-statement-v2-09052022-en.pdf](https://www.humanitarianresponse.info/sites/www.humanitarianresponse.info/files/documents/files/iycf_joint-statement-v2-09052022-en.pdf)

<sup>11</sup> Cesar G Victora, Rajiv Bahl, Aluisio J D Barros, Giovanni V A França, Susan Horton, Julia Krasevec, Simon Murch, Mari Jeeva Sankar, Neff Walker, Nigel C Rollins, for The Lancet Breastfeeding Series Group\*, Breastfeeding in the 21st century: epidemiology, mechanisms, and lifelong effect, *The Lancet* 2016; 387: 475–90.

<sup>12</sup> Hoffmann S, Devleeschauwer B, Aspinall W, Cooke R, Corrigan T, Havelaar A, Angulo F, Gibb H, Kirk M, Lake R, Speybroeck N, Torgerson P, Hald T. Attribution of global foodborne disease to specific foods: Findings from a World Health Organization structured expert elicitation. *Public Library of Science (PLoS One)*. 2017 Sep 14;12(9):e0183641. doi: 10.1371/journal.pone.0183641. PMID: 28910293; PMCID: PMC5598938. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5598938/pdf/pone.0183641.pdf>

<sup>13</sup> Forward, for Everyone. 2021 Election Platform. Liberal Party of Canada. Available at: <https://liberal.ca/wp-content/uploads/sites/292/2021/09/Platform-Forward-For-Everyone.pdf>

<sup>14</sup> Intergovernmental Panel on Climate Change (IPCC). Special Report: Special Report on Climate Change and Land, CH05, Food Security. Executive Summary. 2019. Available at: <https://www.ipcc.ch/src/cl/chapter/chapter-5/>

<sup>15</sup> *Intergovernmental Panel on Climate Change*. Energy Systems. 2020. Available at: [https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc\\_wg3\\_ar5\\_chapter7.pdf](https://www.ipcc.ch/site/assets/uploads/2018/02/ipcc_wg3_ar5_chapter7.pdf)

<sup>16</sup> Matthew N Hayek, Scot M. Miller. Underestimates of methane from intensively-raised animals could undermine goals of sustainable development. *Environmental Research Letters*, 2021; DOI: [10.1088/1748-9326/ac02ef](https://doi.org/10.1088/1748-9326/ac02ef) Available at: <https://iopscience.iop.org/article/10.1088/1748-9326/ac02ef/pdf>

<sup>17</sup> Intergovernmental Panel on Climate Change. *Climate change 2014: Synthesis report. Contribution of Working Groups I, II and III to the Fifth Assessment Report of the Intergovernmental Panel on Climate Change*. Geneva: Intergovernmental Panel on Climate Change, 2014 at page 87. Available at: [https://www.ipcc.ch/site/assets/uploads/2018/05/SYR\\_AR5\\_FINAL\\_full\\_wcover.pdf](https://www.ipcc.ch/site/assets/uploads/2018/05/SYR_AR5_FINAL_full_wcover.pdf)

<sup>18</sup> Willett, W., Rockstrom, J., Loken, B., Springmann, M., Lang, T., Vermeulen, S., Garnett, T., Tilman, D., DeClerck, F., Wood, A., Jonell, M., Clark, M., Gordon, L. J., Fanzo, J., Hawkes, C., Zurayk, R., Rivera, J. A., De Vries, W., Sibanda, L.M., Murray, C. J. L. (2019). Food in the anthropocene: The EAT–lancet commission on healthy diets from sustainable food systems. *The Lancet*, 393(10170), 447–492, including for example at p. 478 and Table 6. Available at: <https://www.thelancet.com/action/showPdf?pii=S0140-6736%2818%2931788-4>

<sup>19</sup> Aleksandrowicz L, Green R, Joy EJ, Smith P, Haines A. The Impacts of Dietary Change on Greenhouse Gas Emissions, Land Use, Water Use, and Health: A Systematic Review. *Public Library of Science (PLoS One)*. 2016 Nov 3;11(11):e0165797. doi: 10.1371/journal.pone.0165797. PMID: 27812156; PMCID: PMC5094759. Available at: <https://www.ncbi.nlm.nih.gov/pmc/articles/PMC5094759/pdf/pone.0165797.pdf>

<sup>20</sup> General Comment No.5 General Measures of Implementation (CRC/GC/2003/5), paragraph 45 at page 38. Available at: <https://www.unicef-irc.org/publications/pdf/crcgencommen.pdf>