***Swedish comments on the ”General Comment on Public Spending for Childrens’ Rights”***

It is important to involve the State Parties in matters concerning how the Convention on the Rights of the Child (CRC) can be interpreted and implemented. Sweden considers this consultation process to be an important tool in this regard and very much appreciates this opportunity to comment om the much inspiring work of the committee. Article 4 is a central article for the implementation of the CRC and the Committee's initiative to develop a guidance and support for the interpretation and implementation of Article 4 through this General Comment is much welcomed.

Against the background of our experience of raising awareness of the right of the child, we find it important that the General Comment is easy to grasp and can be applied as a practical tool for States Parties work with children's rights. We find the draft thorough and comprehensive. The comment, however, would benefit from becoming more user friendly and more concrete in order to provide a good support regarding the States Parties continued work on the implementation of the rights of the child.

Sweden welcomes that reporting, evaluating and auditing is highlighted as important part of implementation work in the General Comment. Our experience shows that reporting, evaluation and audit are particularly important at local and regional level, where many of the activities that directly affect children are decided upon within the budget processes of municipalities and county council. Children's and young people's experiences are a momentous input in planning for future reforms and efforts. While there is a considerable interest in matters concerning children’s participation in Sweden, there is also a demand for more concrete knowledge (methods) on how girls and boys could be involved in the budget process. If this could be further clarified in the General Comment, this would be much appreciated. We believe that, in particular, how children and young people's influence could be used in the follow-up of decisions and actions could be further elaborated upon. Swedish experience shows that it is possibly easier for children and young people to analyse completed reforms and efforts than analysing future consequences of budget propositions.

We would also like to draw attention to para 21, in which the Committee mentions in that article 4 are "..an intrinsic obligation that can be invoked before a court". We believe that the legal analysis of this could be further developed in the General Comment.

We consider the implementation of children’s rights to involve the entire public sector. As the child rights policy in Sweden is cross-sectorial, some activities are carried out within the budget appropriations of other areas and other ministries. Thus, we have found it difficult to provide information about the total amount of resources allocated to this task, although the concept of visualizing children in budgeting and budgetary analysis is interesting with regard to the implementation of the convention.

The Committee has recommended that Sweden in its next periodic report to the Committee should provide specific information in figures and percentages, on the national budget with regard to the implementation of the Convention. Further, the Committee recommended that Sweden to adapt a child rights – based approach in the preparation of the State budget by implementing a tracking system for the allocation and use of resources for children throughout the budget. The Committee also recommended Sweden to establish a high-level mechanism with a clear mandate and the authority to ensure equal access to all rights at the regional and local levels, and provide the necessary human, technical and financial resources for its effective operation.

It would be helpful if the General Comment regarding Public Spending and the Rights of the Child gave a clearer and more concrete guidance on how these recommendations could be implemented in practice. Furthermore, a guide to practical examples from different States would also be appreciated and most helpful.