**Draft General Comment No. 25**

**Children’s rights in relation to the digital environment**

**COMMENTS BY JAPAN**

1. Japan appreciates the work of the Committee on the Rights of the Child to monitor States Parties’ implementation of the Convention on the Rights of the Child. Japan wishes to thank the Committee for the opportunity to comment on Draft General Comment No. 25 on children’s rights in relation to the digital environment.
2. Japan understands that the General Comment represents the Committee’s view on interpretation of the Convention, that it does not change or revise the provisions of the Convention, and that it is not legally binding to the States parties. This understanding does not, however, alter Japan’s appreciation for the Committee’s efforts to help promote and protect the rights of the child.
3. In addition to the general observations above, Japan notes that the third sentence in paragraph 61, which makes no reference to the nature of the “opinions” mentioned, could be interpreted to mean that the act of expressing any opinion, including those that constitute criminal acts such as calls for terrorism, will not be prosecuted. Japan therefore suggests that “where there are any justifiable grounds for non-prosecution” or some similar qualification be included at the end of the third sentence.