

*In 2012, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The Government adopted a new Labor Code that raises the minimum age for work to 15 and addresses the worst forms of labor and trafficking in persons. The Government also promulgated a list of hazardous occupations prohibited for children. The Government continued to implement its National Action Plan to Combat Child Labor (2010-2015). However, a gap between the minimum age for work and the age for compulsory education leaves children ages 13 to 15 particularly vulnerable to the worst forms of child labor. Children continue to engage in the worst forms of child labor, particularly in dangerous work in agriculture.*



### Statistics on Working Children and Education

Children	Age	Percent
Working	5-14 yrs.	35.6 (56,840)
Attending School	5-14 yrs.	44.2
Combining Work and School	7-14 yrs.	23.9
Primary Completion Rate		74.8

#### Sources:

**Primary completion rate:** Data from 2008, published by UNESCO Institute for Statistics, 2013.(1)

**All other data:** Understanding Children's Work Project's analysis of statistics from MICS Survey, 2000.(2)

### Prevalence and Sectoral Distribution of the Worst Forms of Child Labor

Children in Comoros are engaged in the worst forms of child labor, many of them in dangerous work in agriculture.(3) Although the extent of the problem is unknown, children reportedly cultivate cloves, vanilla, and *ylang ylang* (a flower). Children also engage in hazardous work in animal husbandry and, although evidence is limited, fishing.(4-7) Children's work in these sectors may involve using potentially dangerous machinery and tools, carrying heavy loads, and applying harmful pesticides.(8) Fishing may involve dangers such as the risk of injury and drowning.(9)

In urban areas, some children engage in hazardous work as domestic servants in exchange for food, shelter, or educational opportunities.(4, 7, 10-12) These children often work long

hours, risk physical and sexual abuse, and are not paid for their work.(13) Some children may be engaged in commercial sexual exploitation and drug trafficking.(14)

Children facing forced labor conditions can be found in agriculture and domestic service.(6) In Comoros and other countries, it is a traditional practice to send children to Koranic teachers to receive Arabic reading instruction at the private homes of the instructors, which may also include a vocational or apprenticeship component.(15) Since the instructors are not paid for their services at these home-based, informal institutions, children do household chores. Girls usually clean the home while boys work in the garden of the instructor.(15-18)

### Laws and Regulations on the Worst Forms of Child Labor

The Government adopted a new Labor Code during the reporting period.(19, 20) The Labor Code establishes the minimum age for work and apprenticeship at 15, but this does not apply to self-employed children or children performing light work in domestic service or agriculture as long as the work does not interfere with their education, or physical or moral development.(7, 19, 21, 22) Children in apprenticeships must be paid and the duration of the apprenticeship should not exceed three years.(21)

# Comoros

## International Conventions and Selected Laws on Child Labor and Education

	C138, Minimum Age	✓
	C182, Worst Forms of Child Labor	✓
	CRC	✓
	CRC Optional Protocol on Armed Conflict	No
	CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography	✓
	Palermo Protocol on Trafficking in Persons	No
	Minimum Age for Work	15
	Minimum Age for Hazardous Work	18
	Compulsory Education Age	12
	Free Public Education	Yes

The Labor Code requires that children work no more than 40 hours per week and receive a minimum of 12 consecutive hours off per day.(19, 23, 24) A labor inspector can require a medical examination of a child to confirm that the work does not exceed his or her strength.(19, 23) The Labor Code prohibits the use of children for illicit activities, including drug trafficking.(19)

The law prohibits child prostitution, child pornography, and the sexual exploitation of children.(4, 19) The Labor Code prohibits forced and bonded labor except in instances of obligatory military service, civic duty, or work that is required in times of accidents, fires, and calamities.(19, 25) The Labor Code prohibits trafficking in persons.(19, 20) The minimum age for voluntary military recruitment is 18.(26)

During the reporting period, the Council of Ministers adopted a list of the worst forms of child labor, drafted in consultation with ILO. The list includes domestic work, tourism, agro-forestry, fishing, and livestock.(20) Children under the age of 18 are prohibited from engaging in all labor deemed dangerous with specific limits placed on the loads that children aged 15 to 18 can carry in non-dangerous jobs. Children under the age of 16 cannot work in most construction jobs; with mechanical machinery, sewing machines, or steam-powered equipment; or in cafés, theaters, or other public places.(27, 28)

## Institutional Mechanisms for Coordination and Enforcement

The Government has established Regional Committees on each island to serve as surveillance and identification mechanisms for cases of violence against children and child labor, and to educate communities on child labor.(17, 20)

The Ministry of Labor is responsible for enforcing child labor laws, but currently has no labor inspectors.(3, 20) The Police Commissioner and the Deputy Commandants of the Anjouan and Moheli Gendarmerie Brigades have established anti-child labor units in their respective forces.(22, 29) The responsibilities of these units are not clear from available research.

In 2010, the Government participated in the Regional Program for Eastern Africa (2009–2012) to counter trafficking of children, and supported the EAPCCO, a regional effort to improve its law enforcement capacity to combat human trafficking.(30) It is unclear whether the Government was involved in either of these efforts during the reporting period.

## Government Policies on the Worst Forms of Child Labor

The Government continued to implement its National Action Plan to Combat Child Labor (2010-2015). The Plan's many goals include harmonizing labor laws, mobilizing groups to combat the worst forms of child labor, promoting universal primary education, addressing family poverty, collecting systematic information on the worst forms of child labor, and establishing a coordinating mechanism.(14, 20)

Child labor concerns have been mainstreamed into the United Nations Development Assistance Framework (2008-2012).(31)

Children in Comoros are required to attend school only until age 12, and students must pay fees as well as purchase their own supplies.(4, 22, 32) This makes children ages 13 to 15 particularly vulnerable to the worst forms of child labor as they are not required to be in school but are not legally permitted to work either. Additionally, the costs of private schooling are prohibitive for many families. In areas where public schools are not easily accessible, these costs may bar children's access to education, especially for girls, as families are less likely to pay for them to attend school than they are for boys.(22, 32)

The National Plan on Education for all in 2015 includes the goal of universal primary education.(22) A Ministry of Education official reported that over 200 new public primary schools have been opened.(33)

## Social Programs to Eliminate or Prevent the Worst Forms of Child Labor

The National Action Plan proposes several programs targeting the worst forms of child labor; however, research found no evidence that any were implemented during the reporting period.(34)

In 2012, Comoros participate in the USDOL-funded, 4-year Global Action Program on Child Labor Issues Project. In Comoros, the project aims to build the capacity of the national government and develop strategic policies to address the elimination of child labor and forced labor.(35)

## Based on the reporting above, the following actions would advance the elimination of the worst forms of child labor in Comoros:

Area	Suggested Actions	Year(s) Action Recommended
Laws and Regulations	Extend the minimum age for work to self-employed children.	2010, 2011, 2012
	Establish minimum age for children performing light work in domestic service and agriculture.	2012
Coordination and Enforcement	Employ labor inspectors and provide them with training on the worst forms of child labor.	2009, 2010, 2011, 2012
	Carry out inspections to enforce compliance with worst forms of child labor laws and make information on the outcome of inspections available.	2009, 2010, 2011, 2012
Policies	Make education a viable alternative to exploitative work by raising the compulsory education age to 15, the established minimum age for work, and by eliminating school fees and providing supplies for students.	2009, 2010, 2011, 2012
Social Programs	Implement social programs to address the worst forms of child labor in agriculture and domestic service.	2009, 2010, 2011, 2012

## REFERENCES

- UNESCO Institute for Statistics. *Gross intake ration to the last grade of primary. Total.*; accessed February 4, 2013; <http://www.uis.unesco.org/Pages/default.aspx?SPSLanguage=EN>. Data provided is the gross intake ratio to the last grade of primary school. This measure is a proxy measure for primary completion. For more information, please see the "Children's Work and Education Statistics: Sources and Definitions" section of this report.
- UCW. *Analysis of Child Economic Activity and School Attendance Statistics from National Household or Child Labor Surveys.* February 5, 2013. Reliable statistical data on the worst forms of child labor are especially difficult to collect, given the often hidden or illegal nature of the worst forms. As a result, statistics on children's work in general are reported in this chart, which may or may not include the worst forms of child labor. For more information on sources used, the definition of working children and other indicators used in this report, please see the "Children's Work and Education Statistics: Sources and Definitions" section of this report.
- U.S. Embassy- Antananarivo. *reporting, February 15, 2011.*
- U.S. Department of State. "Comoros," in *Country Reports on Human Rights Practices- 2011.* Washington, DC; May 24, 2012; [http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm?dynamic\\_load\\_id=186182](http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/index.htm?dynamic_load_id=186182).
- Direction Generale de la Condition feminine/Protection de l'enfant official. Interview with USDOL consultant. April 24, 2007.
- Ministère de la Fonction Publique et du Travail Official. Interview with USDOL consultant. May 1, 2007.
- ILO Committee of Experts. *Individual Direct Request concerning Minimum Age Convention, 1973 (No. 138) Comoros (ratification: 2004)* Published: 2012; accessed October 19, 2012; <http://www.ilo.org/ilolex/english/iloquery.htm>.
- International Labour Office. *Children in hazardous work: What we know, What we need to do.* Geneva, International Labour Organization; 2011. [http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_155428.pdf](http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_155428.pdf). While country-specific information on the dangers children face in agriculture is not available, research studies and other reports have documented the dangerous nature of tasks in agriculture and their accompanying occupational exposures, injuries and potential health consequences to children working in the sector.
- International Labour Office. *Children in hazardous work: What we know, What we need to do.* Geneva, International Labour Organization; 2011. [http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_155428.pdf](http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_155428.pdf). While country-specific information on the dangers children face in fishing is not available, research studies and other reports have documented the dangerous nature of tasks in fishing and their accompanying occupational exposures, injuries and potential health consequences to children working in the sector.
- SOS Espoir official. Interview with USDOL consultant. April 25, 2007.
- Bureau de Réseau Femme et Développement official. Interview with USDOL consultant. May 1, 2007.
- Ministère de l'Economie de l'Union des Comores. Interview with USDOL official. April 21, 2007.

13. International Labour Office. *Children in hazardous work: What we know, What we need to do*. Geneva, International Labour Organization; 2011. [http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms\\_155428.pdf](http://www.ilo.org/wcmsp5/groups/public/---dgreports/---dcomm/---publ/documents/publication/wcms_155428.pdf). While country-specific information on the dangers children face in domestic work is not available, research studies and other reports have documented the dangerous nature of tasks in domestic work and their accompanying occupational exposures, injuries and potential health consequences to children working in the sector.
14. Ministère de l'Economie du Travail de l'Emploi du Commerce Extérieur. *Plan d'Action National pour l'Élimination des Pires Formes de Travail des Enfants aux Comores: 2010-2015*. Moroni; October 2009.
15. Ministère de l'Economie de l'Emploi et du Travail. Interview with USDOL consultant. April 21, 2007.
16. Union Internationale des Droits de l'Homme. Interview with USDOL consultant. April 24, 2007.
17. U.S. Embassy- Antananarivo official. E-mail communication to USDOL official. May 9, 2012.
18. U.S. Embassy- Antananarivo. *reporting, May 13, 2013*.
19. Government of Comoros. *Loi N 12- Abrogeant, Modifiant et Complétant Certaines Dispositions de la Loi N 84-108/PR Portant Code du Travail, 84-108/PR*, enacted June 28, 2012. <http://www.ilo.org/dyn/natlex/docs/WEBTEXT/1515/64795/F84COM01.htm>.
20. U.S. Embassy- Antananarivo. *reporting, February 4, 2013*.
21. Government of Comoros. *Relative à l'apprentissage*, Loi No. 88-014/AF, enacted December 10, 1980.
22. African Committee of Experts on the Rights and Welfare of the Child (ACERWC). *Harmonisation of Children's Laws in Comoros*. Country Brief. Addis Ababa, ACERWC; May 15, 2012. <http://www.acerwc.org/wp-content/uploads/2012/05/English-ACERWC-Comoros-Harmonisation-of-Laws-on-Children.pdf>.
23. Government of Comoros. *Code du Travail*, Loi No. 84-018/PR portant Code du Travail, enacted 1984. <http://www.ilo.org/dyn/natlex/docs/WEBTEXT/1515/64795/F84COM01.htm>.
24. Government of Comoros. *Fixant les Modalités d'application de la Durée du Travail et les majorations de Salaire pour les heures Effectuées au delà de la Durée Legale de 40 heures par Semaine*, Arrête No. 01-386, enacted December 27, 2001.
25. U.S. Embassy- Antananarivo. *reporting, March 11, 2011*.
26. Child Soldiers International. *Louder than Words: An Agenda for Action to End State Use of Child Soldiers*. London; September 2012. [http://www.child-soldiers.org/global\\_report\\_reader.php?id=562](http://www.child-soldiers.org/global_report_reader.php?id=562).
27. U.S. Embassy- Antananarivo official. E-mail communication to USDOL official. June 17, 2013.
28. Government of Comoros. *Liste des travaux dangereux aux Comores*, enacted 2012. [source on file].
29. U.S. Embassy- Antananarivo. *reporting, December 15, 2011*.
30. UNODC. *Promoting the Rule of Law and Human Security in Eastern Africa*. Program Document; United Nations. November 23, 2009. [www.unodc.org/documents/easternfrica/regional-ministerial-meeting/Eastern\\_Africa\\_Regional\\_Programme\\_Final\\_Draft.pdf](http://www.unodc.org/documents/easternfrica/regional-ministerial-meeting/Eastern_Africa_Regional_Programme_Final_Draft.pdf).
31. UNDAF. *Plan Cadre des Nations Unies pour l'Aide au Développement, 2008-2012: Comoros*; 2008. [http://www.km.undp.org/doc/undf\\_08.pdf](http://www.km.undp.org/doc/undf_08.pdf).
32. U.S. Embassy- Antananarivo official. E-mail communication to USDOL official. March 18, 2011.
33. Ministry of Education official. Interview with US Embassy- Antananarivo official. April 25, 2013.
34. U.S. Embassy- Antananarivo. *reporting, January 6, 2012*.
35. ILO-IPEC. *Global Action Program on Child Labor Issues*. Technical Progress Report. Geneva; April 2013.