

# Comoros

*The Government of Comoros has adopted a National Action Plan to Combat Child Labor. Children continue to work in agriculture and domestic service sectors with reports of forced child labor. Gaps remain in legislation, enforcement, and programs to address the worst forms of child labor.*

## Statistics on Working Children and School Attendance

Children	Age	Percent
Working	5-14 yrs.	35.6%
Attending School	5-14 yrs.	44.2%
Combining Work and School	7-14 yrs.	23.9%



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

Children in Comoros are exploited in the worst forms of child labor,<sup>1168</sup> many of them in agriculture. The majority of working children in Comoros are found in rural areas and on the Island of Ndzuwani.<sup>1169</sup>

Children's work in agriculture includes cultivating cloves, vanilla and ylang ylang (a flower). Children are also engaged in animal husbandry and fishing.<sup>1170</sup> Children's work in these sectors may involve the use of potentially dangerous machinery and tools, carrying heavy loads, application of harmful pesticides, and exposure to disease and injuries from animals. Fishing, likewise, involves dangerous activities such as risk of injury and drowning.<sup>1171</sup>

In urban areas, some children work as domestic servants in exchange for food, shelter, or educational opportunities. These children often work long hours, risk physical and sexual abuse, and are not paid for their work.<sup>1172</sup> Some children are engaged in commercial sexual exploitation and drug trafficking.<sup>1173</sup>

Children facing forced labor conditions can be found in agriculture and domestic service.<sup>1174</sup> In addition, the practice of sending boys to Koranic teachers to receive education, which may include a vocational or apprenticeship component, is a tradition in various

countries, including Comoros. While some boys receive lessons, many are engaged in forced labor, which includes carrying produce, selling items in markets, and performing various domestic activities.<sup>1175</sup>


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

The Labor Code establishes the minimum age for work and apprenticeship at 15.<sup>1176</sup> Children in apprenticeships must be paid, and the duration should not exceed three years.<sup>1177</sup> Children in Comoros are required to attend school only until the age of 12. This standard 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.

The Labor Code requires that children work no more than 40 hours per week and receive a break of a minimum of 12 consecutive hours per day.<sup>1178</sup> A labor inspector can require a medical examination of a child to confirm that the work does not exceed his or her strength.<sup>1179</sup> Research has not identified any laws or regulations specifying a list of hazardous work activities that are prohibited for children.

The law prohibits pornography and sexual exploitation of children under the age of 18.<sup>1180</sup> The Labor Code prohibits forced and bonded labor, except in instances

of obligatory military service; civic duty; and work that is required in times of accidents, fires, and calamities. While the law does not expressly forbid trafficking in persons, traffickers may be prosecuted for kidnapping.<sup>1181</sup> The minimum age for voluntary military recruitment is 18.<sup>1182</sup> The law does not prohibit the use of children in illicit activities.

	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	None
	Compulsory Education Age	12
	Free Public Education	No

### Institutional Mechanisms for Coordination and Enforcement

The Ministry of Labor is responsible for policy coordination regarding child labor issues and enforcement of child labor laws.<sup>1183</sup> The Government has three labor inspectors. This small number of inspectors appears to be insufficient given the size

of the problem. In addition, during the year, the Government did not perform any inspections or provide training to labor inspectors.<sup>1184</sup>

### Government Policies on the Worst Forms of Child Labor

During the reporting period, the Government adopted a 5-year National Action Plan to Combat Child Labor (2010-2015).<sup>1185</sup> The Plan aims to harmonize labor laws; sensitize the population and mobilize groups to combat the worst forms of child labor; promote universal primary education; increase access to secondary and non-formal education; provide services to victims and vulnerable children; address family poverty; collect systematic information on the worst forms of child labor; and to establish a coordinating mechanism.<sup>1186</sup>

Child labor concerns have been mainstreamed into the United Nations Development Assistance Framework (2008-2012).<sup>1187</sup> While development of these policies is an important step to address the worst forms of child labor, they do not address the fact that education is not free in Comoros, which may serve as a barrier to school attendance, making children more vulnerable to involvement in the worst forms of child labor.

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

During the year, the Government conducted awareness-raising activities related to the new National Action Plan.<sup>1188</sup> Research found no evidence of any other social programs targeting the worst forms of child labor.

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

**IN THE AREA OF LAWS AND REGULATIONS:**

- Draft and enact legal provisions specifying a list of hazardous work activities in Comoros that are prohibited for children.
- Raise the compulsory education age to 15, the established minimum age for work.
- Enact a law to prohibit the use of children in illicit activities, along with appropriate penalties, in accordance with international standards.

**IN THE AREA OF COORDINATION AND ENFORCEMENT:**

- Increase the number of labor inspectors and provide them with training on the worst forms of child labor.
- Carry out inspections to enforce compliance with worst forms of child labor laws, and make available information on the outcome of inspections.

**IN THE AREA OF POLICY:**

- Take appropriate measures to institute free education.

**IN THE AREA OF PROGRAMS:**

- Design and implement social programs, besides awareness raising, targeting the worst forms of child labor, particularly in the agriculture and domestic service sectors.

<sup>1168</sup> Data provided in the chart at the beginning of this country report are based on UCW analysis of ILO SIMPOC, UNICEF MICS, and World Bank surveys, *Child Economic Activity, School Attendance, and Combined Working and Studying Rates, 2005-2010*. Data provided are from 2000. Reliable 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 and information on children's work in general are reported in this section, 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.

<sup>1169</sup> Commissariat Général au Plan Union des Comores, Programme des Nations Unies pour le Développement, *Pauvreté, Inégalité et Marché du travail dans l'Union des Comores: Eléments d'analyse Fondés sur l'Enquête Intégrale Auprès des Ménages de 2004*, Moroni, December 2005, XX. See also Ministère du Plan Union des Comores, de l'Amenagement du Territoire, de l'Energie et de l'urbanisme, *Enfants et Adolescents aux Comores: Analyse des Données du Recensement Général de la Population et de l'Habitat 2003*, Moroni, September 2005, 27.

<sup>1170</sup> U.S. Department of State, "Comoros," in *Country Reports on Human Rights Practices- 2009*, Washington, DC, March 11, 2010, section 7d; available from <http://www.state.gov/g/drl/rls/hrrpt/2009/index.htm>. See also Ministère de la Sante. Direction Generale de la Condition feminine/Protection de l'enfant official, Interview with USDOL consultant, April 24, 2007. See also Ministère de la Fonction Publique et du Travail de l'Union des Comores official, Interview with USDOL consultant, May 1, 2007.

<sup>1171</sup> Ministère de l'Economie de l'Union des Comores official, Interview with USDOL consultant, April 21, 2007.

<sup>1172</sup> U.S. Department of State, "Country Reports- 2009: Comoros," section 7d. See also SOS ESPOIR official, Interview with USDOL consultant, April 25, 2007. See also Bureau de Réseau Femme et Développement official, Interview with USDOL consultant, May 1, 2007. See also Ministère de l'Economie de l'Union des Comores official, Interview, April 21, 2007.

<sup>1173</sup> Ministère de l'Economie du Travail de l'Emploi du Commerce Extérieur, *Plan d'Action National pour l'Elimination des Pires Formes de Travail des Enfants aux Comores: 2010-2015*, Moroni, October 2009, 6.

<sup>1174</sup> Ministère de l'Economie de l'Union des Comores official, Interview, April 21, 2007. See also Ministère de l'Economie de l'Emploi et du travail official, Interview with USDOL consultant, April 21, 2007.

<sup>1175</sup> Union Internationale des Droits de l'Homme official, Interview with USDOL consultant, April 24, 2007. See also Ministère de l'Economie de l'Union des Comores official, Interview, April 21, 2007.

<sup>1176</sup> Government of Comoros, *Relative à l'apprentissage*, Loi No. 88-014/AF (December 10, 1980), articles 5. See also Government of Comoros, *Code du Travail*, Loi No. 84 -018/PR portant Code du Travail, (1984), article 123; available from <http://www.ilo.org/dyn/natlex/docs/WEBTEXT/1515/64795/F84COM01.htm>.

<sup>1177</sup> Government of Comoros, *Loi relative a l'apprentissage*, articles 5, 10 and 16. See also Government of Comoros, *Code du Travail*, article 123.

<sup>1178</sup> Government of Comoros, *Code du Travail*, article 119. See also 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, (December 27, 2001), article 1.

<sup>1179</sup> Government of Comoros, *Code du Travail*, articles 124, 231.

<sup>1180</sup> U.S. Department of State, "Country Reports- 2009: Comoros," section 6.

<sup>1181</sup> U.S. Embassy- Antananarivo, *reporting (TIP)*, February 17, 2010, para 27a-e.

<sup>1182</sup> Coalition to Stop the Use of Child Soldiers, "Comoros," in *Child Soldiers Global Report 2008*, London, 2008; available from <http://www.child-soldiers.org/home>.

<sup>1183</sup> U.S. Embassy- Antananarivo, *reporting (WCF)*, February 17, 2010, para 1. See also U.S. Embassy- Antananarivo, *reporting (TIP)*, February 17, 2010, para 26b.

<sup>1184</sup> U.S. Embassy- Antananarivo, *reporting (WCF)*, February 17, 2010.

<sup>1185</sup> Ministère de l'Economie du Travail de l'Emploi du Commerce Extérieur, *Plan d'Action National: 2010-2015*. See also U.S. Embassy- Antananarivo, *reporting (WCF)*, February 17, 2010, para 2b13. See also U.S. Embassy official, E-mail communication to USDOL official, July 23, 2010.

<sup>1186</sup> Ministère de l'Economie du Travail de l'Emploi du Commerce Extérieur, *Plan d'Action National: 2010-2015* 33-45.

<sup>1187</sup> UNDAF, *Plan Cadre des Nations Unies pour l'Aide au Développement, 2008-2012: Comoros*, 2008, 8; available from <http://www.undg.org/unct.cfm?module=CoordinationProfile&page=Country&CountryID=COI>.

<sup>1188</sup> U.S. Embassy- Antananarivo, *reporting (TIP)*, February 17, 2010, para 2f1. See also U.S. Embassy official, E-mail communication, July 23, 2010. See also U.S. Department of State, "Country Reports- 2009: Comoros," section 7d.