

In 2017, Comoros made a minimal advancement in efforts to eliminate the worst forms of child labor. The government amended the Strategy for Accelerated Growth and Sustainable Development to include activities to combat child labor, including updating the draft National Action Plan to Combat Child Labor and conducting a quantitative survey on child labor. However, children in Comoros engage in the worst forms of child labor, including in forced domestic work. Children also perform dangerous tasks in agriculture. A gap between the minimum age for work and the age for compulsory education leaves children ages 13 to 15 vulnerable to child labor. In addition, social programs to combat child labor are insufficient to adequately address the extent of the problem.



## I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Comoros engage in the worst forms of child labor, including in forced domestic work. Children also perform dangerous tasks in agriculture. (1; 2; 3; 4; 5) Table 1 provides key indicators on children's work and education in Comoros.

**Table 1. Statistics on Children's Work and Education**

| Children                      | Age     | Percent       |
|-------------------------------|---------|---------------|
| Working (% and population)    | 5 to 14 | 23.0 (42,145) |
| Attending School (%)          | 5 to 14 | 81.5          |
| Combining Work and School (%) | 7 to 14 | 20.8          |
| Primary Completion Rate (%)   |         | 77.7          |

Source for primary completion rate: Data from 2014, published by UNESCO Institute for Statistics, 2018. (6)

Source for all other data: Understanding Children's Work Project's analysis of statistics from Demographic and Health Survey (DHS), 2012. (7)

Based on a review of available information, Table 2 provides an overview of children's work by sector and activity.

**Table 2. Overview of Children's Work by Sector and Activity**

| Sector/Industry                         | Activity   |
|---|--|
| Agriculture                             | Production of manioc,† beans,† vanilla,† cloves,† and ylang-ylang† (8)                         |
|   | Animal husbandry† (4)  |
|   | Fishing† (3; 9; 4; 10)   |
| Industry                                | Construction,† including in carpentry† (4)   |
|   | Extracting and selling marine sand† (8)  |
| Services                                | Domestic work† (1; 2; 9; 11; 12; 4)  |
|   | Street vending (13; 3; 4)  |
|   | Repairing cars† and bicycles,† including tire vulcanization† and battery charging† (4)         |
| Categorical Worst Forms of Child Labor‡ | Forced labor in domestic work, street vending, baking, fishing, and agriculture (8; 14; 10; 5) |
|   | Commercial sexual exploitation, sometimes as a result of human trafficking (2; 5)              |

† Determined hazardous by national law or regulation.

‡ Child labor understood as the worst forms of child labor *per se* under Article 3(a)–(c) of ILO C. 182.

Some parents who are unable to care for their children send them to wealthier families that are expected to provide food, shelter, and schooling to the children in exchange for housework. In practice, some of these children receive care and an education, while many become domestic workers and are victims of labor exploitation and abuse. (3; 8; 4; 15; 5) In Comoros, it is a traditional practice to send children to Koranic teachers to receive an education. Some Koranic teachers, however, force their students to work; girls usually perform domestic work and boys perform agricultural labor. (8; 10; 15; 4; 5) In nearby Mayotte, which is administered

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by France, reports indicate that there are over 3,000 unaccompanied children from Comoros, some of whom are exploited in the worst forms of child labor, including commercial sexual exploitation and forced domestic work. (16; 5)

Although the Constitution guarantees free compulsory primary education, this provision is not adequately enforced, and many children, especially girls, do not attend school. (8) Also, the lack of school infrastructure and the limited availability of teachers impede access to education, which may increase the vulnerability of children to the worst forms of child labor. (1; 8; 9; 12)

## II. LEGAL FRAMEWORK FOR CHILD LABOR

Comoros has ratified most key international conventions concerning child labor (Table 3).

**Table 3. Ratification of International Conventions on Child Labor**

| Convention   | Ratification |
|--|--------------|
|  ILO C. 138, Minimum Age                    | ✓            |
| ILO C. 182, Worst Forms of Child Labor   | ✓            |
|  UN CRC                                     | ✓            |
| UN CRC Optional Protocol on Armed Conflict   | ✓            |
| UN CRC Optional Protocol on the Sale of Children, Child Prostitution and Child Pornography                                   | ✓            |
|  Palermo Protocol on Trafficking in Persons |              |

The government has established laws and regulations related to child labor (Table 4). However, gaps exist in Comoros' legal framework to adequately protect children from the worst forms of child labor, including with the minimum age for work and the compulsory education age.

**Table 4. Laws and Regulations on Child Labor**

| Standard  | Meets International Standards: Yes/No | Age | Legislation   |
|---|---------------------------------------|-----|---|
| Minimum Age for Work  | No                                    | 15  | Article 129 of the Labor Code (17)  |
| Minimum Age for Hazardous Work  | Yes                                   | 18  | Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (17; 18)   |
| Identification of Hazardous Occupations or Activities Prohibited for Children | Yes                                   |     | List of Dangerous Occupations; Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (17; 18; 19)                      |
| Prohibition of Forced Labor   | Yes                                   |     | Articles 2.1 and 131 of the Labor Code; Article 13 of the Law to Combat Child Labor and Trafficking (17; 18)  |
| Prohibition of Child Trafficking  | Yes                                   |     | Article 131 of the Labor Code; Article 13 of the Law to Combat Child Labor and Trafficking (17; 18)   |
| Prohibition of Commercial Sexual Exploitation of Children                     | Yes                                   |     | Article 131 of the Labor Code; Articles 8–11 and 13 of the Law to Combat Child Labor and Trafficking; Articles 322 and 323 of the Penal Code (17; 18; 20) |
| Prohibition of Using Children in Illicit Activities                           | Yes                                   |     | Article 131(c) of the Labor Code; Article 6(c) of Law to Combat Child Labor and Trafficking (17; 18)  |
| Prohibition of Military Recruitment   |                                       |     |   |
| State Compulsory  | N/A*                                  |     |   |
| State Voluntary   | Yes                                   | 18  | Article 41 of Law No. 97-06/AF (21)   |
| Non-state   | Yes                                   |     | Article 6(a) of Law to Combat Child Labor and Trafficking (18)  |
| Compulsory Education Age  | No                                    | 12  | Article 2 of the Outline Act on the Education System (22)   |
| Free Public Education   | Yes                                   |     | Article 1 of the Outline Act on the Education System; Preamble of the Constitution (22; 23)   |

\* No conscription (24)

The government has drafted a Penal Code and a Code of Criminal Procedures that increase the penalties for human trafficking crimes and has submitted a proposal to ratify the Palermo Protocol on Trafficking in Persons; however, neither of these legislative proposals were enacted during the reporting period. (25; 16; 26)

The Labor Code allows children under the minimum age to perform light work in domestic work or agriculture as long as it does not interfere with education or physical or moral development. (17) The Labor Code, however, does not specify the conditions under which light work may be conducted or limit the number of hours for light work, as defined by international standards on child labor. (27) In addition, the Labor Code applies only to workers who perform work under a formal employment agreement, which does not conform to international standards that require all children to be protected under the law establishing a minimum age for work. (3; 27)

Children in Comoros are required to attend school only up to age 12. This standard makes children ages 13 through 15 vulnerable to the worst forms of child labor because they are not required to attend school but are not legally permitted to work. (28)

### III. ENFORCEMENT OF LAWS ON CHILD LABOR

The government has established relevant institutional mechanisms for the enforcement of laws and regulations on child labor (Table 5). However, gaps exist within the operations of the Ministry of Labor that may hinder adequate enforcement of their child labor laws.

**Table 5. Agencies Responsible for Child Labor Law Enforcement**

| Organization/Agency                                       | Role  |
|---|---|
| Ministry of Labor (MOL)                                   | Enforce child labor laws, investigate allegations of child labor, and refer cases of the worst forms of child labor for criminal investigation. (8; 4; 5)   |
| Police Morals and Minors Brigade                          | Investigate allegations of child abuse, including child trafficking, and refer cases for prosecution. (4; 5; 29) Operates nationwide covering the islands of Grande Comore, Anjouan, and Mohéli. (29) |
| Ministry of Justice (MOJ)                                 | Prosecute criminal cases, including those related to child trafficking. (16; 4)   |
| National Commission for Human Rights and Freedoms (CNDHL) | Receive complaints of the worst forms of child labor, investigate violations, and refer cases to the MOJ for prosecution. (13; 30)  |

#### *Labor Law Enforcement*

In 2017, labor law enforcement agencies in Comoros took actions to combat child labor (Table 6). However, gaps exist within the operations of the Ministry of Labor that may hinder adequate labor law enforcement, including with financial and human resource allocation.

**Table 6. Labor Law Enforcement Efforts Related to Child Labor**

| Overview of Labor Law Enforcement                                 | 2016     | 2017        |
|---|----------|-------------|
| Labor Inspectorate Funding  | Unknown  | Unknown     |
| Number of Labor Inspectors  | 4 (13)   | 4 (13; 4)   |
| Inspectorate Authorized to Assess Penalties                       | Yes (14) | Yes (14; 4) |
| Training for Labor Inspectors                                     |          |             |
| Initial Training for New Employees                                | N/A      | N/A         |
| Training on New Laws Related to Child Labor                       | N/A      | N/A         |
| Refresher Courses Provided  | No (13)  | Yes (4)     |
| Number of Labor Inspections Conducted                             | 0 (13)   | 15 (4)      |
| Number Conducted at Worksites                                     | 0 (13)   | 15 (13; 4)  |
| Number of Child Labor Violations Found                            | 0 (13)   | 0 (13; 4)   |
| Number of Child Labor Violations for Which Penalties were Imposed | N/A      | N/A (4)     |
| Number of Child Labor Penalties Imposed that were Collected       | N/A      | N/A (4)     |
| Routine Inspections Conducted                                     | No (14)  | No (14; 4)  |
| Routine Inspections Targeted                                      | N/A      | N/A         |
| Unannounced Inspections Permitted                                 | Unknown  | Yes (4)     |

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**Table 6. Labor Law Enforcement Efforts Related to Child Labor (cont)**

| Overview of Labor Law Enforcement  | 2016     | 2017       |
|--|----------|------------|
| Unannounced Inspections Conducted  | No (14)  | No (14; 4) |
| Complaint Mechanism Exists   | Yes (31) | Yes (31)   |
| Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services | Unknown  | Unknown    |

In 2017, the Ministry of Labor employed four labor inspectors: two in Grand Comore, one for Anjouan, and one for Mohéli. (13; 4) The number of labor inspectors is likely insufficient for the size of Comoros' workforce, which includes approximately 278,500 workers. According to the ILO's technical advice of a ratio approaching 1 inspector for every 40,000 workers in less developed economies, Comoros would employ about 7 inspectors. (14; 32; 33; 34) Reports indicate there is a lack of training, equipment, transportation, and funding available to conduct child labor inspections and legal proceedings. (8; 4; 35; 5; 25)

### *Criminal Law Enforcement*

Research did not find information on whether criminal law enforcement agencies in Comoros took actions to combat child labor (Table 7).

**Table 7. Criminal Law Enforcement Efforts Related to Child Labor**

| Overview of Criminal Law Enforcement  | 2016       | 2017        |
|---|------------|-------------|
| Training for Investigators  |            |             |
| Initial Training for New Employees  | No (13)    | No (4)      |
| Training on New Laws Related to the Worst Forms of Child Labor                        | N/A        | N/A (4)     |
| Refresher Courses Provided  | No (13)    | No (4)      |
| Number of Investigations  | 0 (13; 16) | Unknown (4) |
| Number of Violations Found  | 0 (13)     | Unknown (4) |
| Number of Prosecutions Initiated  | 0 (13; 16) | Unknown (4) |
| Number of Convictions   | 0 (13; 16) | Unknown (4) |
| Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services | No (3)     | No (4)      |

Reports indicate that a lack of trained staff, equipment, transportation, and funding inhibit criminal law enforcement efforts on the worst forms of child labor. (1; 3; 5; 4; 29) Police are unable to open an investigation unless the victim self-reports the alleged crime at the police station and can pay the expenses associated with the investigation, including fuel and telephone fees; therefore, investigations are reactive and depend on the victim's wealth and knowledge of the criminal justice system, making investigations of cases involving victimized children unlikely. (3; 25)

## IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

The government has established mechanisms to coordinate its efforts to address child labor (Table 8). However, gaps exist that hinder the effective coordination of efforts to address child labor, including with efficacy in accomplishing mandates.

**Table 8. Key Mechanisms to Coordinate Government Efforts on Child Labor**

| Coordinating Body   | Role and Description   |
|---|--|
| National Committee against Child Labor                        | Coordinate government efforts on child labor. Chaired by the Ministry of Labor. (12; 27; 4)  |
| Monitoring Group for the Fight Against Trafficking in Persons | Coordinate actions against human trafficking and implement the Anti-Trafficking in Persons Action Plan. Headed by the Secretary General of the Government and includes representatives from the MOL, MOJ, CNDHL, and police. (3; 4; 5; 29) |

The National Committee against Child Labor and the Monitoring Group for the Fight against Trafficking in Persons were inactive and did not receive funding during the reporting period. (4; 31; 25)

## V. GOVERNMENT POLICIES ON CHILD LABOR

The government has established policies related to child labor (Table 9). However, policy gaps exist that hinder efforts to address child labor, including with funding and implementation.

**Table 9. Key Policies Related to Child Labor**

| Policy  | Description   |
|---|---|
| National Policy for the Protection of Children (2016–2021)              | Aims to improve child protection in Comoros; includes components to combat the worst forms of child labor, with a focus on child trafficking. Led by the Ministry of Health, Solidarity, Social Cohesion and Gender. (4; 5; 12) In 2017, distributed copies of child protection laws to judicial authorities and trained police authorities on child protection. (36)             |
| Strategy for Accelerated Growth and Sustainable Development (2015–2019) | Aims to reduce poverty, promote sustainable development, and increase access to social services. Integrates strategies that target child labor. (26; 37) In December 2017, the Strategy was amended to include activities to combat child labor, including updating the draft National Action Plan to Combat Child Labor and conducting a quantitative survey on child labor. (4) |

In 2017, the government did not adopt the draft National Action Plan to Combat Child Labor. (4)

## VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2017, the government funded and participated in programs that include the goal of eliminating or preventing child labor (Table 10). However, gaps exist in these social programs, including funding and adequacy of efforts to address the problem in all sectors.

**Table 10. Key Social Programs to Address Child Labor**

| Program                                 | Description   |
|---|---|
| Child Protection Units†                 | Government program that provides social and reintegration services to vulnerable and sexually abused children. Comprises three government-operated units on the islands of Anjouan, Grande Comore, and Mohéli. (3; 26)  |
| Decent Work Country Program (2015–2019) | Program that aims to guarantee labor rights and extend social protection programs for vulnerable populations, including by improving the operational environment for the elimination of child labor and its worst forms. (11) Overseen by the MOL and supported by the ILO. In 2017, provided vocational services to improve decent work for 50 youth. (38) |
| UNICEF Country Program (2015–2019)      | \$20,885 UNICEF-funded program that supports the government's efforts to strengthen children's rights to survival, development, education, protection, and social inclusion. (1; 26) In 2017, continued to fund shelters for victims of the worst forms of child labor operated by the <i>Service d'Ecoute</i> . (4; 25)                                    |

† Program is funded by the Government of Comoros.

Although the government has programs that target child labor in place, their scope is insufficient to fully address the extent of the problem, particularly in agriculture, domestic work, and commercial sexual exploitation of children. (16; 5; 29; 25) Comoros also lacks a specific program to assist children exploited by religious instructors.

## VII. SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE CHILD LABOR

Based on the reporting above, suggested actions are identified that would advance the elimination of child labor in Comoros (Table 11).

**Table 11. Suggested Government Actions to Eliminate Child Labor**

| Area            | Suggested Action  | Year(s) Suggested |
|-----------------|---|-------------------|
| Legal Framework | Ratify the Palermo Protocol on Trafficking in Persons.  | 2014 – 2017       |
|                 | Ensure that the law's light work provisions prescribe the number of hours per week that light work may be undertaken, and specify the conditions under which light work may be conducted, as defined by international standards on child labor. | 2012 – 2017       |
|                 | Ensure that the law's minimum age provisions and protections apply to children in unpaid or non-contractual work.   | 2015 – 2017       |
|                 | Raise the compulsory education age to 15 to be equivalent to the minimum age for work.  | 2009 – 2017       |

**Table 11. Suggested Government Actions to Eliminate Child Labor (cont)**

| Area                | Suggested Action   | Year(s) Suggested |
|---------------------|--|-------------------|
| Enforcement         | Carry out criminal investigations to enforce compliance with the laws that address child labor.  | 2009 – 2017       |
|                     | Increase the resources, training, available transportation and equipment, and number of criminal law investigators and labor inspectors responsible for enforcing laws on child labor to provide adequate coverage of the workforce. | 2009 – 2017       |
|                     | Publish information on the Labor Inspectorate's funding, the number of criminal law investigations, violations found, prosecutions initiated, and convictions related to cases of the worst forms of child labor.                    | 2009 – 2017       |
|                     | Strengthen the Labor Inspectorate by initiating routine inspections rather than performing inspections based solely on complaints received, and by conducting unannounced inspections.   | 2017              |
|                     | Establish referral mechanisms between labor and criminal law enforcement agencies and social welfare entities.   | 2014 – 2017       |
| Coordination        | Ensure that the National Committee Against Child Labor and the Monitoring Group for the Fight Against Trafficking in Persons are active and receive adequate funding to fulfill their mission.                                       | 2014 – 2017       |
| Government Policies | Adopt the draft National Action Plan to Combat Child Labor.  | 2016 – 2017       |
| Social Programs     | Enhance efforts to eliminate barriers and make education accessible for all children, including girls, by increasing school infrastructure and teacher availability.   | 2014 – 2017       |
|                     | Expand existing programs to address the scope of the child labor problem, particularly in agriculture, domestic work, and commercial sexual exploitation.  | 2009 – 2017       |
|                     | Implement a program to assist children exploited by religious instructors.   | 2016 – 2017       |

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