

Comoros

In 2011, Comoros made a minimal advancement in efforts to eliminate the worst forms of child labor. Although the Government established child labor committees in all of the country's islands, policy incoherence between minimum age for work and compulsory education laws leaves children ages 13 to 14 particularly vulnerable to the worst forms of child labor. In addition, the Government has not addressed many other gaps in the legislative framework that may put children at risk of exploitative labor, including the lack of a list of hazardous occupations prohibited to children. Children are still engaged 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, 2012.(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) Some reportedly cultivate cloves, vanilla and *ylang ylang* (a flower). Children also engage in animal husbandry and fishing.(4-7) Children's work in these sectors may involve using potentially dangerous machinery and tools, carrying heavy loads and applying harmful pesticides; they are also exposed to disease and injuries from animals.(8) Fishing may involve dangers such as the risk of injury and drowning.(9)

In urban areas, some children 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, 15) In Comoros and other countries, it is a traditional practice to send children to Koranic



teachers to receive education, which may include a vocational or apprenticeship component. While some children receive lessons, some are engaged in forced labor, which includes agricultural work, selling items in markets and performing various domestic activities.(15-17)

Laws and Regulations on the Worst Forms of Child Labor

The Labor Code establishes the minimum age for work and apprenticeship at 15, but this does not apply to self-employed children.(7, 18, 19) Children in apprenticeships must be paid and the duration of the apprenticeship should not exceed 3 years.(18)

| | | |
|---|---|----|
|  | 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 | No |
|  | Compulsory Education Age | 12 |
| | Free Public Education | No |

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, 20) A labor inspector can require a medical examination of a child to confirm that the work does not exceed his or her strength.(19) Research has not identified any laws or regulations specifying a list of hazardous work activities that are prohibited for children.

The law prohibits child prostitution, child pornography and the sexual exploitation of children.(4) 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.(21) Current legislation does not expressly forbid trafficking in persons, but traffickers may be prosecuted for kidnapping.(21) The National Assembly was considering anti-trafficking legislation, but it had not been enacted as of the end of the reporting period.(22) The minimum age for voluntary military recruitment is 18.(23) The law does not prohibit the use of children in illicit activities.

Institutional Mechanisms for Coordination and Enforcement

The Government established Regional Committees on each island in September of 2011 to serve as surveillance and identification mechanisms for cases of violence against children and child labor, and to educate communities on child labor. In practice the Committees did not appear to be operational.(17, 22)

The Ministry of Labor is responsible for enforcing child labor laws, and currently has three labor inspectors.(21, 24) This small number of inspectors appears to be insufficient given the size of the problem. During the reporting period, the Government did not perform any inspections or provide training to labor inspectors.(24) International organizations, in cooperation with the Government, provided training for other groups, including police, *gendarmes* (a military body charged with police duties among civilian populations), public officials, and community organizations and religious leaders. The Police Commissioner and the Deputy Commandants of the Anjouan and Moheli Gendarme Brigades established anti-child labor units in their respective forces during the reporting

period.(22) 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 Eastern African Police Chiefs Co-operation organization, a regional effort to improve its law enforcement capacity to combat human trafficking.(25) 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)

Child labor concerns have been mainstreamed into the United Nations Development Assistance Framework (2008-2012).(26)

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, 27) 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. Additionally, the costs of schooling are prohibitive for many families, barring their access to education.(27)

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.(24)

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 |
| | Draft and enact legal provisions specifying a list of hazardous work activities that are prohibited for children. | 2009, 2010, 2011 |

| Area | Suggested Actions | Year(s) Action Recommended |
|------------------------------|---|----------------------------|
| Laws and Regulations | Enact a law to prohibit the use of children in illicit activities in accordance with international standards. | 2009, 2010, 2011 |
| | Approve the new anti-trafficking law drafted in 2011. | 2011 |
| Coordination and Enforcement | Increase the number of labor inspectors and provide them with training on the worst forms of child labor. | 2009, 2010, 2011 |
| | 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 |
| 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 |
| Social Programs | Implement social programs to address the worst forms of child labor in agriculture and domestic service. | 2009, 2010, 2011 |

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