

In 2013, Comoros made a minimal advancement in efforts to eliminate the worst forms of child labor. The Government implemented a new Anti-Trafficking in Persons Action Plan, and established the Inter-Agency Monitoring Group to coordinate its efforts to carry out commitments against trafficking in persons. While child labor does not appear to be widespread in Comoros, children continue to engage in the worst forms of child labor in fishing and domestic service. Comoros lacks social programs targeting sectors in which children work. Furthermore, a gap between the minimum age for work and the age for compulsory education leaves children ages 13 to 15 particularly vulnerable to child labor. Finally, access to free public education is limited in rural areas.



## I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Comoros are engaged in the worst forms of child labor in fishing and domestic service. Children are also work in agriculture.(1-4) 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)    | 5-14 yrs. | 35.6 (56,840) |
| Attending School (%)          | 5-14 yrs. | 44.2          |
| Combining Work and School (%) | 7-14 yrs. | 23.9          |
| Primary Completion Rate (%)   |           | 79.8          |

Source for primary completion rate: Data from 2008, published by UNESCO Institute for Statistics, 2013.(5)

Source for all other data: Understanding Children's Work Project's analysis of statistics from MICS Survey, 2000.(6)

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                             | Activities unknown* (3, 7)   |
|   | Fishing,*† activities unknown (1, 3)   |
| Services                                | Domestic service*† (1, 3, 4, 7)  |
| Categorical Worst Forms of Child Labor‡ | Forced labor in domestic service,* street vending,* baking,* and agriculture* (1, 7) |
|   | Drug trafficking* (7)  |
|   | Commercial sexual exploitation sometimes as a result of human trafficking* (7)       |

\* Evidence of this activity is limited and/or the extent of the problem is unknown.

† 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.

Children are sometimes sent to live with wealthy families to obtain educational opportunities; but in some cases, they are forced to work in domestic service instead.(1, 3, 4, 7) In Comoros and in other countries, it is a traditional practice to send children to receive Arabic reading instruction at the homes of private instructors. Since these instructors are not paid for their services at these home-based, informal institutions, children may be forced to work in the instructors' homes.(3, 4, 7, 8) Girls usually clean the homes, while boys work as field hands or in the gardens.(3, 4, 7, 8)

### II. LEGAL FRAMEWORK ON THE WORST FORMS OF 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 relevant laws and regulations related to child labor (Table 4).

**Table 4. Laws and Regulations Related to Child Labor**

| Standard  | Yes/No | Age | Related Legislation   |
|---|--------|-----|---|
| Minimum Age for Work                                      | Yes    | 15  | Article 123 of the Labor Code; Article 129 of Law No. 12 of 2012 (9, 10)  |
| Minimum Age for Hazardous Work                            | Yes    | 18  | List of Dangerous Occupations (11, 12)                                    |
| List of Hazardous Occupations Prohibited for Children     | Yes    |     | List of Dangerous Occupations (11, 12)                                    |
| Prohibition of Forced Labor                               | Yes    |     | Article 2 of Law No. 12 of 2012 (10)                                      |
| Prohibition of Child Trafficking                          | Yes    |     | Article 131 of Law No. 12 of 2012; Article 333 of the Penal Code (10, 13) |
| Prohibition of Commercial Sexual Exploitation of Children | Yes    |     | Article 131 of Law No. 12 of 2012; Penal Code (1, 3, 10)                  |
| Prohibition of Using Children in Illicit Activities       | Yes    |     | Article 131 of Law No. 12 of 2012 (10)                                    |
| Minimum Age for Compulsory Military Recruitment           | N/A*   |     |   |
| Minimum Age for Voluntary Military Service                | Yes    | 18  | Article 41 of Law No. 97-06 (AF) (14)                                     |
| Compulsory Education Age                                  | Yes    | 12  | Article 2 of the Outline Act on the Education System (15)                 |
| Free Public Education                                     | Yes    |     | Constitution (12, 16)   |

\* No conscription or no standing military.

In 2013, the Council of Ministers accepted and validated a new Penal Code and new Criminal Procedures Code to increase the penalties for child labor and incorporate sanctions against trafficking in persons. The codes have been submitted to the National Assembly, but have not yet been ratified.(3)

Article 123 of the Labor Code and Article 129 of Law No. 12 of 2012 establish the minimum age for work and apprenticeship as 15, but this does not apply to children working in the informal sector, or children performing light work in domestic service or agriculture, as long as the work does not interfere with the children's education, or their physical or moral development.(2, 10, 13, 17) Children in Comoros are required to attend school only until age 12. The compulsory school age leaves 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.(4, 12, 13)

### III. ENFORCEMENT OF LAWS ON THE WORST FORMS OF CHILD LABOR

The Government has established institutional mechanisms for the enforcement of laws and regulations on child labor, including its worst forms (Table 5).

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

| Organization/Agency              | Role  |
|----------------------------------|---|
| Ministry of Labor                | Enforce child labor laws, investigate allegations of child labor, and refer cases for investigation.(3, 18, 19) |
| Police Morals and Minors Brigade | Investigate allegations of child abuse and refer cases for prosecution.(3)                                      |
| Ministry of Justice              | Prosecute criminal cases.(3)  |

Criminal law enforcement agencies in Comoros took actions to combat child labor, including its worst forms. However, research found no evidence that agencies responsible to enforce labor laws took such actions.

#### *Labor Law Enforcement*

The number of labor inspectors for 2013 is unavailable. The MOL had one inspector for each island in 2012.(18, 19) In 2013, there were no MOL inspections related to child labor, as there were no allegations reported to the MOL; thus no child labor law violations were found nor were there any citations issued.(3) Labor inspectors did not receive training on child labor issues during the reporting period.(20) Moreover, research did not reveal information on the MOL's funding levels.

#### *Criminal Law Enforcement*

In 2013, an ongoing investigation led to the removal of one child from domestic service. Additionally, two investigators on the Morals and Minors Brigade received training on how to prevent and combat trafficking in persons during the reporting period.(3) No information was found regarding the number of criminal investigators, about whether the criminal investigators were trained on child labor issues other than trafficking in persons, or about the funding levels of the agencies responsible for criminal law enforcement.

### IV. COORDINATION OF GOVERNMENT EFFORTS ON THE WORST FORMS OF CHILD LABOR

The Government has established mechanisms to coordinate its efforts to address child labor, including its worst forms (Table 6).

**Table 6. Mechanisms to Coordinate Government Efforts on Child Labor**

| Coordinating Body                       | Role & Description  |
|---|---|
| National Committee Against Child Labor  | Coordinate government efforts on child labor.(3)  |
| Regional Committees Against Child Labor | Serve as surveillance and identification mechanisms on each island for cases of child labor and violence against children, and educate communities on child labor.(8, 19)   |
| Inter-Agency Monitoring Group           | Established in 2013, coordinate efforts to meet commitments to fight trafficking in persons. Headed by the Secretary General of the Government and reports to the Cabinet on a weekly basis on progress in implementing the National Action Plan to Combat Child Labor and the new Anti-Trafficking in Persons Action Plan.(3) Members include the Government Human Rights Officer, and representatives of the Ministries of Education, Interior, Justice, Foreign Affairs, and Health, Police, Gendarmes, and child protection NGOs.(16) |

In 2013, the Government established the Inter-Agency Monitoring Group to coordinate its efforts to carry out commitments against trafficking in persons.(3)

### V. GOVERNMENT POLICIES ON THE WORST FORMS OF CHILD LABOR

The Government of Comoros has established policies related to child labor, including its worst forms (Table 7).

**Table 7. Policies Related to Child Labor**

| Policy   | Description  |
|--|--|
| National Action Plan to Combat Child Labor (NAP) (2010–2015) | Aims to harmonize labor laws, mobilize groups to combat the worst forms of child labor, promote universal primary education, address family poverty, and collect systematic information on the worst forms of child labor.(19, 21)   |
| Anti-Trafficking in Persons Action Plan†                     | Prescribes applying existing laws related to trafficking in persons and considering new laws to specifically prohibit it, creating a mechanism for identifying victims of trafficking and for referring them to the appropriate social services, and raising awareness of the phenomenon.(3, 22) |
| National Plan on Education For All in 2015                   | Includes the goal of universal primary education.(13)  |
| Poverty Reduction and Growth Strategy Paper                  | Includes goals such as reducing poverty and increasing access to social services, such as education and preventative health.(23, 24)   |

† Policy was launched during the reporting period.

According to a Ministry of Education official, the Government opened more than 200 new schools in 2012. Although the IMF reports that Comoros increased its spending for education by 30 percent ,and for school construction by 60 percent in 2013, access to school remains a problem in some rural areas.(25, 26) In areas where public schools are not easily accessible, the costs of private schooling are prohibitive for many families. These costs may prevent children, especially girls, from attending school, because families are less likely to pay for their education.(4, 12, 13, 27)

### VI. SOCIAL PROGRAMS TO ADDRESS THE WORST FORMS OF CHILD LABOR

In 2013, the Government of Comoros funded and participated in programs that include the goal of eliminating or preventing child labor, including its worst forms (Table 8).

**Table 8. Social Programs to Address Child Labor**

| Program   | Description   |
|---|---|
| NAP‡  | Government plan that proposes several programs targeting the worst forms of child labor; Government held a high-level awareness-raising conference on stopping child labor in November of 2013 as part of this plan.(21, 26, 28)  |
| Global Action Program on Child Labor Issues Project | USDOL-funded project implemented by the ILO in approximately 40 countries, to support the priorities of the Roadmap for Achieving the Elimination of the Worst Forms of Child Labor by 2016 established by the Hague Global Child Labor Conference in 2010. In Comoros, aims to increase the knowledge base around child labor by collecting new data, analyzing existing data, and building capacity to conduct research in this area.(29) |

‡ Program is funded by the Government of Comoros.

Research found no evidence that any other programs proposed in the National Action Plan to Combat Child Labor were implemented during the reporting period.

### VII. SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE THE WORST FORMS OF CHILD LABOR

Based on the reporting above, suggested actions are identified that would advance the elimination of child labor, including its worst forms, in Comoros (Table 9).

**Table 9. Suggested Government Actions to Eliminate Child Labor, Including its Worst Forms**

| Area                | Suggested Action   | Year(s) Suggested |
|---------------------|--|-------------------|
| Laws                | Extend the minimum age for work to children working in the informal sector.  | 2010 – 2013       |
|                     | Establish a minimum age for children performing light work in domestic service and agriculture.  | 2012 – 2013       |
| Enforcement         | Provide inspectors with training on child labor.   | 2009 – 2013       |
|                     | Carry out inspections to enforce compliance with the laws addressing child labor.  | 2009 – 2013       |
|                     | Ensure that data on child labor law and criminal law enforcement are collected and made publicly available.  | 2009 – 2013       |
| Government Policies | Make education a viable alternative to work by raising the compulsory education age to 15, the established minimum age for work, and by making public schools more accessible. | 2009 – 2013       |
| Social Programs     | Conduct research to determine the activities carried out by children, particularly in agriculture.   | 2013              |
|                     | Implement social programs to address child labor, including its worst forms.   | 2009 – 2013       |

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