

In 2014, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The Government approved the Law to Combat Child Labor and Trafficking, which strengthened penalties for child labor and child trafficking. The Law also provides legal protection and social assistance to victims of the worst forms of child labor and child trafficking. The Government also increased the coverage of the Police Morals and Minors Brigade by establishing new brigades on the islands of Anjouan and Moheli, where the majority of human trafficking cases reportedly occur. However, children in Comoros are engaged in child labor, including in agriculture, and in the worst forms of child labor, including in domestic work. A gap between the minimum age for work and the age for compulsory education leaves children ages 13 to 15 vulnerable to child labor. Limited resources for the systematic enforcement of child labor laws impede government efforts to protect children from the worst forms of child labor. Social programs to combat child labor are also insufficient to adequately address the extent of the problem.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Comoros are engaged in child labor, including in agriculture.(1-3) Children are also engaged in the worst forms of child labor, including in domestic work.(1-5) 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)	5-14 yrs.	23.0 (42,145)
Attending School (%)	5-14 yrs.	81.5
Combining Work and School (%)	7-14 yrs.	20.8
Primary Completion Rate (%)		79.8

Source for primary completion rate: Data from 2008, published by UNESCO Institute for Statistics, 2015.(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	Seeding,*† weeding,*† and harvesting,*† particularly in the production of manioc,* beans,* vanilla,*† cloves,*† and ylang-ylang*† (1, 2, 8, 9) Capturing and processing fish*† (1, 8, 10)
Industry	Extracting and selling marine sand*(1)
Services	Domestic work*† (1, 2, 8-10)
Categorical Worst Forms of Child Labor‡	Forced labor in domestic work,* street vending,* baking,* fishing* and agriculture* (1, 2)
	Used in illicit activities, including drug trafficking *(2)
	Commercial sexual exploitation*sometimes as a result of human trafficking*(1, 2)

* 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.

Comoros

MODERATE ADVANCEMENT




Some parents who are unable to care for their children send them to wealthy 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.(1, 2, 10) In Comoros, it is a traditional practice to send children to Koranic teachers to receive an education. However, some Koranic teachers, force their students to work; girls usually perform domestic work, while boys perform agricultural labor.(2, 10, 11)

Although the Constitution guarantees free compulsory primary education, in practice this provision is not enforced effectively, as many children do not attend school.(1, 8) Also, the lack of school infrastructure and 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 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 laws and regulations related to child labor, including its worst forms (Table 4).

Table 4. Laws and Regulations Related to Child Labor

Standard	Yes/No	Age	Related Legislation
Minimum Age for Work	Yes	15	Article 129 of the Labor Code(13)
Minimum Age for Hazardous Work	Yes	18	Article 7 of Law 14-034 to Combat Child Labor and Trafficking (14)
Prohibition of Hazardous Occupations or Activities for Children	Yes		List of Dangerous Occupations (15)
Prohibition of Forced Labor	Yes		Article 2.1 of the Labor Code (13)
Prohibition of Child Trafficking	Yes		Article 131 of the Labor Code; Articles 345-348 of the Penal Code; Article 13 of Law 14-034 to Combat Child Labor and Trafficking (13, 14, 16)
Prohibition of Commercial Sexual Exploitation of Children	Yes		Article 131 of the Labor Code; Article 323 of the Penal Code; Article 8 of Law 14-034 to Combat Child Labor and Trafficking (1, 10, 13, 14)
Prohibition of Using Children in Illicit Activities	Yes		Article 131 of the Labor Code; Article 6 of Law 14-034 to Combat Child Labor and Trafficking (13, 14)
Minimum Age for Compulsory Military Recruitment	N/A*		
Minimum Age for Voluntary Military Service	Yes	18	Article 41 of Law No. 97-06/AF (17)
Compulsory Education Age	Yes	12	Article 2 of the Outline Act on the Education System (18)
Free Public Education	Yes		Article 1 of the Outline Act on the Education System; Preamble of the Constitution (18, 19)

* No conscription (20)

Article 129 of the Labor Code establishes the minimum age for work and apprenticeship as 15, but this does not apply to children performing light work in domestic work or agriculture, as long as the work does not interfere with the children's education, or with their physical or moral development.(8, 13, 16, 21) Children in Comoros are required to attend 6 years of primary school, through age 12. Since the minimum age for children to work is 15, children ages 13 to 15 are particularly vulnerable to the worst forms of child labor, as they may have completed primary school but are not legally permitted to work.(3, 8, 16, 22)

In December 2014, the Government adopted the Law to Combat Child Labor and Trafficking, bringing Comoran law into compliance with international standards on the worst forms of child labor.(14, 23) The law prescribes penalties of up to 10 years' imprisonment and a fine up to \$11,000 for those convicted of the worst forms of child labor, a punishment sufficiently stringent and commensurate with the penalties prescribed for other serious crimes, such as rape. The Law also provides legal protection and social assistance to victims of the worst forms of child labor and child trafficking.(14)

A new Anti-Trafficking in Persons law has been developed, but it was not approved during the reporting period.(2, 24) A proposal to ratify the Palermo Protocol on Trafficking in Persons was submitted to the National Assembly, but it was also not approved during the reporting period.(5, 23)

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 (MOL)	Enforce child labor laws, investigate allegations of child labor, and refer cases for investigation.(1, 10)
Police Morals and Minors Brigade (PMMB)	Investigate allegations of child abuse, including child trafficking, and refer cases for prosecution.(1, 2, 5)
Ministry of Justice	Prosecute criminal cases.(10)

Law enforcement agencies in Comoros took actions to combat child labor, including its worst forms.

Labor Law Enforcement

In 2014, the Ministry of Labor (MOL) employed three labor inspectors, one for each of the three islands.(25) Given the prevalence of child labor in the country, the number of labor inspectors is inadequate. MOL inspectors organized training workshops for the Regional Committees Against Child Labor on laws and regulations on child labor, including its worst forms.(25) No labor inspections were conducted and no citations were issued for violations of child labor law during the reporting period.(8) In addition, reports indicate a lack of equipment, transportation, and funding to conduct effective child labor inspections and legal proceedings.(23)

Criminal Law Enforcement

In 2014, the Government of Comoros established new Police Morals and Minors Brigades (PMMB) to investigate child abuse and exploitation on the islands of Anjouan and Moheli, where the majority of trafficking cases reportedly occur.(2, 5) No information was found regarding the total number of criminal investigators. PMMB investigators in Grand Comore Island were trained on trafficking in persons issues.(23) The number of criminal investigations, prosecutions, and convictions related to the worst forms of child labor is unavailable. Research did not find whether a referral mechanism exist between criminal law enforcement and social welfare services. In addition, reports indicate a lack of trained staff, equipment, transportation, and funding to effectively conduct criminal law enforcement efforts related to the worst forms of child labor.(23)

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, including the implementation of the National Action Plan to Combat Child Labor.(10)
Regional Committees Against Child Labor	Identify cases of child labor and violence against children, and educate communities on child labor.(26)
Monitoring Group for the Fight Against Trafficking in Persons	Coordinate actions against trafficking in persons and provides rehabilitation services to victims at the national level.(2) Headed by the Secretary General of the Government and reports to the Cabinet on a weekly basis on progress in implementing the Anti-Trafficking in Persons Action Plan.(10) Members include the Government Human Rights Officer, and representatives of the Ministries of Education, Interior, Justice, Foreign Affairs, and Health; the Police, Gendarmes and child protection NGOs.(10)

In 2014, the Monitoring Group for the Fight Against Trafficking in Persons organized a series of public awareness and education campaigns on child trafficking and abuse.(2, 24) The Regional Committees Against Child Labor were active to various extents; for example, the regional committee in Anjouan organized workshops to raise awareness on child labor in the fishing and marine sand extraction sectors.(25) Research did not determine whether the National Committee Against Child Labor was active during the reporting period.

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.(8, 27)
Anti-Trafficking in Persons Action Plan	Includes the goals of enhancing the legal framework to prevent human trafficking and commercial sexual exploitation; effectively implementing laws, providing effective protection and care for victims; and raising awareness of trafficking in persons.(10, 28)
National Plan on Education for All in 2015	Includes the goal of universal primary education, and integrates strategies that target child labor.(3, 8, 16)
Poverty Reduction and Growth Strategy Paper*	Includes goals such as reducing poverty and increasing access to social services, such as education and preventative health.(29, 30)

* Child labor elimination and prevention strategies do not appear to have been integrated into this policy.

A new Poverty Reduction and Growth Strategy Paper that includes the goal of eliminating the worst forms of child labor has been developed, but it was not approved during the reporting period.(25)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2014, 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
Global Action Program on Child Labor Issues	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. Aims to build the capacity of the Government and develop strategic policies to address the elimination of child labor and forced labor in Comoros.(31) In 2014, the project supported the Government in organizing awareness raising campaigns and training workshops on child labor.(32, 33)

Although Comoros has programs that target child labor, the scope of these programs is insufficient to fully address the extent of the problem, particularly in agriculture and domestic work.

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
Legal Framework	Ratify the Palermo Protocol on Trafficking in Persons.	2014
	Establish a minimum age for children performing light work in domestic work and agriculture.	2012 – 2014
	Raise the compulsory education age to 15 to be equivalent to the minimum age for work.	2009 – 2014
Enforcement	Increase the resources, training, and number of criminal law investigators and labor inspectors responsible for enforcing laws related to child labor in order to provide adequate coverage of the workforce.	2009 – 2014
	Collect and make publicly available information on the number of PMMB criminal investigators; law violations and penalties assessed; as well as criminal investigations, prosecutions, and convictions related to the worst forms of child labor.	2009 – 2014
	Establish a referral mechanism between criminal law enforcement agencies and social welfare services.	2014
	Carry out inspections to enforce compliance with the laws addressing child labor.	2009 – 2014
Coordination	Ensure that the National Committee Against Child Labor actively carries out responsibilities related to the worst forms of child labor.	2014
Government Policies	Integrate child labor elimination and prevention strategies into existing education and child protection policies.	2014
Social Programs	Ensure that all children have access to education by establishing and implementing a program to address the lack of teachers and schools.	2014
	Expand existing programs to address the scope of the child labor problem, particularly in agriculture and domestic work.	2009 – 2014

REFERENCES

- U.S. Department of State. "Comoros," in *Country Reports on Human Rights Practices- 2013*. Washington, DC; February 27, 2014; <http://www.state.gov/j/drl/rls/hrrpt/humanrightsreport/#wrapper>.
- U.S. Department of State. "Comoros," in *Trafficking in Persons Report- 2014*. Washington, DC; 2014; <http://www.state.gov/documents/organization/226845.pdf>.
- ILO Committee of Experts. *Individual Direct Request concerning Worst Forms of Child, 1999 (No. 182) Comoros (ratification: 2004) Published: 2014*; accessed November 6, 2014; <http://www.ilo.org/ilolex/english/iloquery.htm>.
- ILO Committee of Experts. *Individual Direct Request concerning Minimum Age Convention, 1973 (No. 138) Comoros (ratification: 2004) Published: 2012*; accessed January 7, 2014; <http://www.ilo.org/ilolex/english/iloquery.htm>.
- U.S. Embassy- Antananarivo. *reporting, January 14, 2015*.
- UNESCO Institute for Statistics. *Gross intake ratio to the last grade of primary Total*. [accessed January 16, 2015]; <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*. Original data from Demographic and Health Survey (DHS), 2012. Analysis received January 16, 2015. 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.
- ILO Committee of Experts. *Individual Direct Request concerning Minimum Age Convention, 1973 (No. 138) Comoros (ratification: 2004) Published: 2014*; accessed November 5, 2014; <http://www.ilo.org/ilolex/english/iloquery.htm>.
- UNICEF. *Comoros Country Programme Document Program Report*. Geneva; September 11, 2014. http://www.unicef.org/about/execboard/files/2014-PL5_Comoros_CPD-final_approved-EN.pdf.
- U.S. Embassy- Antananarivo. *reporting, January 24, 2014*.
- U.S. Department of State. "Comoros," in *Trafficking in Persons Report- 2013*. Washington, DC; June 19, 2013; <http://www.state.gov/documents/organization/210738.pdf>.
- Ministry of Education, Research, Culture and Arts, in Charge of Youth and Sports. *Diagnostic du Système éducatif comorien pour une politique nouvelle dans le cadre de l'EPT: Rapport d'Etat du Système Éducatif Comorien (RESEN)*. Moroni; February 12, 2012. http://www.unicef.org/evaldatabase/files/Comoros_RESEN_2012-101_vf.pdf.
- 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/WBTEXT/1515/64795/F84COM01.htm>.
- Government of Comoros. *Loi N° 14- 034/AU Portant lutte contre le travail et la traite des enfants* enacted December 22, 2014. <http://www.ilo.org/dyn/natlex/docs/MONOGRAPH/98176/116722/F962391713/COM-98176.pdf>.
- Government of Comoros. *Liste des travaux dangereux aux Comores*, enacted 2012.
- African Committee of Experts on the Rights and Welfare of the Child (ACERWC). *Harmonisation of Children's Laws in Comoros*. Country Brief. Addis Ababa; May 15, 2012. <http://www.acerwc.org/wp-content/uploads/2012/05/English-ACERWC-Comoros-Harmonisation-of-Laws-on-Children.pdf>.
- Government of Comoros. *Loi N° 97- 006/AF Portant Statut des personnels militaires de la République Fédérale Islamique des Comores*, enacted July 21, 1997.

Comoros

MODERATE ADVANCEMENT

18. Government of Comoros. *Loi N°94-035/AF Portant orientation sur l'éducation*, enacted January 20, 1995.
19. Government of Comoros. *Constitution*, enacted December 23, 2001. <http://www.ilo.org/dyn/natlex/docs/ELECTRONIC/72696/74026/F-92095240/COM-72696.pdf>.
20. Child Soldiers International. *Louder than words: An Agenda for Action to End State Use of Child Soldiers*. London; 2013. http://www.child-soldiers.org/global_report_reader.php?id=562.
21. Government of Comoros. *Relative à l'apprentissage*, Loi No. 88-014/AF, enacted December 10, 1980.
22. U.S. Embassy- Antananarivo. *reporting, May 13, 2013*.
23. U.S. Embassy- Antananarivo. *reporting, February 17, 2015*.
24. U.S. Embassy- Antananarivo. *reporting, December 4, 2014*.
25. U.S. Embassy- Antananarivo official. E-mail communication to USDOL official. April 16, 2015.
26. U.S. Embassy- Antananarivo. *reporting, February 4, 2013*.
27. 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.
28. Government of Comoros. *Lettre d'engagement et plan d'action sur la traite des être humains*. Moroni; May 24, 2013.
29. International Monetary Fund. *Union of the Comoros: Poverty Reduction Strategy Paper- Review of the Second Year of Implementation*. Washington, DC; February 2013. Report No. 13/39. <http://www.imf.org/external/pubs/ft/scr/2013/cr1339.pdf>.
30. International Monetary Fund. *Union of the Comoros: Poverty Reduction Strategy Paper: Review of the Second Year of Implementation*. Washington, DC; 2013. <http://www.imf.org/external/pubs/ft/scr/2013/cr1339.pdf>.
31. U.S. Embassy- Antananarivo. *reporting, October 14, 2014*.
32. Obrien & Associates International. *External interim evaluation of the global action program on child labor* April 2014. http://www.dol.gov/ilab/projects/summaries/GAP_FY11_meval.pdf.
33. U.S. Embassy- Antananarivo. *reporting, January 22, 2015*.