

In 2015, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The Government adopted the Decent Work Country Program and the Strategy for Accelerated Growth and Sustainable Development, which aim to improve the operational environment for the elimination of child labor and its worst forms. In addition, the Government funded and participated in multiple programs that include the goal of eliminating or preventing child labor. 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. In addition, 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.(4-7) 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 (%)		73.6

Source for primary completion rate: Data from 2013, published by UNESCO Institute for Statistics, 2015.(8)

Source for all other data: Understanding Children's Work Project's analysis of statistics from Demographic and Health Survey (DHS), 2012.(9)

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	Farming,* activities (3, 10, 11)
	Animal husbandry* (11)
	Agroforestry,* activities unknown (11)
	Fishing,*† activities unknown (10-12)
Industry	Carpentry,* activities unknown (11)
	Construction,* activities unknown (11)
Services	Domestic work† (2, 3, 6, 7, 10-12)
	Repairing* cars and bicycles, including tire vulcanization* and battery charging* (11)
Categorical Worst Forms of Child Labor‡	Forced labor in domestic work,* street vending,* baking,* fishing,* and agriculture* (2, 5, 11)
	Commercial sexual exploitation,* sometimes as a result of human trafficking* (5, 6)

\* 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.(5, 12) 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 and boys perform agricultural labor.(5, 12, 13)




Although the Constitution guarantees free compulsory primary education, in practice, this provision is not enforced effectively, and many children do not attend school.(2, 10) 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.(3, 10, 14)

The Government, in collaboration with civil society partners, conducted a study on the prevalence of child labor in hazardous work; it is unknown whether the results were published during the reporting period.(6)

## 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 (15)
Minimum Age for Hazardous Work	Yes	18	Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (15, 16)
Prohibition of Hazardous Occupations or Activities for Children	Yes		List of Dangerous Occupations; Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (15-17)
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 (15, 16)
Prohibition of Child Trafficking	Yes		Article 131 of the Labor Code; Article 13 of the Law to Combat Child Labor and Trafficking (15, 16)
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 (15, 16, 18)
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 (15, 16)
Minimum Age for Compulsory Military Recruitment	N/A*		
Minimum Age for Voluntary Military Service	Yes	18	Article 41 of Law No. 97-06/AF (19)

**Table 4. Laws and Regulations Related to Child Labor (cont)**

Standard	Yes/No	Age	Related Legislation
Compulsory Education Age	Yes	12	Article 2 of the Outline Act on the Education System (20)
Free Public Education	Yes		Article 1 of the Outline Act on the Education System; Preamble of the Constitution (20, 21)

\* No conscription. (22)

The National Assembly adopted a new Penal Code and Code of Criminal Procedures in June and December 2014, respectively, that prohibit and increase the penalties for human trafficking crimes, but the President did not assent to these codes during the reporting period.(5, 13) The Government submitted a proposal to ratify the Palermo Protocol on Trafficking in Persons to the National Assembly, but the proposal was also not approved during the reporting period.(13, 23)

The Labor Code allows children under the minimum age to perform light work in the home and in the fields, as long as it does not interfere with the children's education or with their physical or moral development(15); however, the Labor Code does not prescribe the number of hours per week for light work, does not determine the activities in which light work may be permitted, and does not specify the conditions in which light work may be undertaken, as defined by the international standards on child labor.(24) In addition, children working in unpaid or non-contractual work do not have the same protections under child labor laws and regulations as do children working in contractual employment.(24)

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 because they may have completed primary school, but are not legally permitted to work.(1, 25, 26)

### 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.(11, 12)
Police Morals and Minors Brigade	Investigate allegations of child abuse, including child trafficking and refer cases for prosecution.(11)
Ministry of Justice (MOJ)	Prosecute criminal cases.(11)
National Commission for Human Rights and Freedoms* (CNDHL)	Investigate allegations of child labor and trafficking and refer cases to the MOJ for prosecution.(11)

\* Agency responsible for child labor enforcement was created during the reporting period.

#### *Labor Law Enforcement*

In 2015, labor law enforcement agencies in Comoros did not take actions to combat the worst forms of child labor (Table 6).

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

Overview of Labor Law Enforcement	2014	2015
Labor Inspectorate Funding	Unknown	Unknown
Number of Labor Inspectors	3 (27)	4 (11)
Inspectorate Authorized to Assess Penalties	Yes	Yes (11)
Training for Labor Inspectors		
■ Initial Training for New Employees	Unknown	No (11)
■ Training on New Laws Related to Child Labor	N/A	N/A
■ Refresher Courses Provided	Unknown	No (11)
Number of Labor Inspections	0 (28)	0 (11)
■ Number Conducted at Worksite	0 (28)	0 (11)
■ Number Conducted by Desk Reviews	0 (28)	0 (11)

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

Overview of Labor Law Enforcement	2014	2015
Number of Child Labor Violations Found	0 (28)	0 (11)
Number of Child Labor Violations for Which Penalties Were Imposed	N/A	N/A
■ Number of Penalties Imposed That Were Collected	N/A	N/A
Routine Inspections Conducted	No (28)	No (11)
■ Routine Inspections Targeted	N/A	N/A
Unannounced Inspections Permitted	Unknown	Unknown
Unannounced Inspections Conducted	No (28)	No (11)
Complaint Mechanism Exists	Unknown	Unknown
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Unknown	Unknown

In 2015, the Ministry of Labor (MOL) employed four labor inspectors: two in Grand Comore, one for Anjouan, and one for Mohéli; the MOL reported this number to be inadequate considering the prevalence of child labor in the country. According to the ILO recommendation of one inspector for every 40,000 workers in less developed economies, Comoros should employ about 6 inspectors to adequately enforce labor laws throughout the country.(11, 29-31) Reports indicate a lack of equipment, transportation, and funding to conduct child labor inspections and legal proceedings.(11)

### *Criminal Law Enforcement*

In 2015, criminal law enforcement agencies in Comoros did not take actions to combat the worst forms of child labor (Table 7).

**Table 7. Criminal Law Enforcement Efforts Related to the Worst Forms of Child Labor**

Overview of Criminal Law Enforcement	2014	2015
Training for Investigators		
■ Initial Training for New Employees	Unknown	No (11)
■ Training on New Laws Related to the Worst Forms of Child Labor	Unknown	N/A
■ Refresher Courses Provided	Yes (23)	No (11)
Number of Investigations	0 (28)	0 (11, 32)
Number of Violations Found	0 (28)	0 (11, 32)
Number of Prosecutions Initiated	0 (28)	0 (11, 32)
Number of Convictions	0 (28)	0 (11, 32)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Unknown	Unknown

Reports indicate a lack of trained staff, equipment, transportation, and funding to effectively conduct criminal law enforcement efforts on the worst forms of child labor.(23, 32) As a result, the 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.(33)

## **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 8).

**Table 8. 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.(12, 24)
Regional Committees Against Child Labor	Identify cases of child labor and violence against children and educate communities on child labor.(34)

**Table 8. Mechanisms to Coordinate Government Efforts on Child Labor (cont)**

Coordinating Body	Role & Description
Monitoring Group for the Fight Against Trafficking in Persons	Coordinate actions against trafficking in persons and provide rehabilitation services to victims at the national level.(5) Headed by the Secretary General of the Government and reports to the cabinet on progress in implementing the Anti-Trafficking in Persons Action Plan.(12) Members include the Government Human Rights Officer; representatives of the Ministries of National Education, Employment, Interior, Justice, External Relations, Finance, and Health; and representatives from the police, Gendarmes, Planning Commission, Office of the Presidency, Human Rights Delegation, CNDHL, and United Nations.(11, 12)

Research did not determine whether the National Committee Against Child Labor, the Regional Committees Against Child Labor, or the Monitoring Group for the Fight Against Trafficking in Persons were active during the reporting period.(6)

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

The Government of Comoros has established policies on child labor, including its worst forms (Table 9).

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

Policy	Description
National Action Plan to Combat Child Labor (2010–2015)	Aimed 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.(6, 24, 35)
Anti-Trafficking in Persons Action Plan	Includes the goals of enhancing the legal framework to prevent human trafficking and commercial sexual exploitation; effectively implementing the laws; providing effective protection and care for victims; and raising awareness of trafficking in persons.(12, 36) In 2015, the TIP Task Force drafted a new action plan, which was not validated because of the presidential elections.(32)
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 by supporting activities outlined in the National Action Plan to Combat Child Labor.(13, 37)
National Plan on Education for All in 2015	Aims to achieve universal primary education and integrates strategies that target child labor.(1, 10, 25)

† Policy was approved during the reporting period.

## VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2015, the Government of Comoros funded and participated in programs that include the goal of eliminating or preventing child labor, including its worst forms (Table 10).

**Table 10. 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.(13)
Decent Work Country Program (2015–2019)†	Identifies two objectives of decent work: (1) creating jobs and guaranteeing rights at work for vulnerable populations and (2) extending social protection and promoting social dialog.(7) Outcomes include improving the operational environment for the elimination of child labor and its worst forms. Overseen by the MOL and supported by the ILO.(7)
UNICEF Country Program (2015–2019)	In cooperation with the Government of Comoros, aims to strengthen children's rights to survival, development, education, protection, and social inclusion.(3, 13)
Social Safety Net Project (2015–2019)*	World Bank-implemented, \$6 million program that aims to increase low-income communities' access to safety net and nutrition services. Seeks to provide cash for work transfers to 5,890 beneficiaries by 2019.(38)

\* Program was launched during the reporting period.

† Program is funded by the Government of Comoros.

Although the Government has in place programs that target child labor, the activities undertaken by these programs in 2016 are unknown and their scope is insufficient to fully address the extent of the problem, particularly in agriculture, domestic work, and commercial sexual exploitation.

### 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 11).

**Table 11. 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 – 2015
	Ensure that the law's light work provisions prescribe the number of hours per week for light work, determine the activities in which light work may be permitted, and specify the conditions in which light work may be undertaken, as defined by international standards on child labor.	2012 – 2015
	Ensure that the law's minimum age provisions and protections apply to children in unpaid or non-contractual work.	2015
	Raise the compulsory education age to 15 to be equivalent to the minimum age for work.	2009 – 2015
Enforcement	Collect information on the labor inspectorate's funding and make it publicly available.	2015
	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 – 2015
	Carry out inspections and criminal investigations to enforce compliance with the laws that address child labor.	2009 – 2015
	Collect and make publicly available information on the number of Police Morals and Minors Brigade criminal investigators, law violations and penalties assessed, and criminal investigations, prosecutions, and convictions related to cases of the worst forms of child labor.	2009 – 2015
	Establish referral mechanisms between labor and criminal law enforcement agencies and social welfare entities.	2014 – 2015
Coordination	Ensure that the National Committee Against Child Labor, the Regional Committees Against Child Labor, and the Monitoring Group for the Fight Against Trafficking in Persons actively carry out their responsibilities related to the worst forms of child labor.	2014 – 2015
Social Programs	Increase children's access to education by increasing school infrastructure and teacher availability.	2014 – 2015
	Expand existing programs to address the scope of the child labor problem, particularly in agriculture, domestic work, and commercial sexual exploitation.	2009 – 2015

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