

In 2022, Comoros made moderate advancement in efforts to eliminate the worst forms of child labor. The government established a National Brigade for the Repression of Illegal Migrant Smuggling and Trafficking in Persons, and the National Committee on the Prevention of Illegal Migrant Smuggling and Trafficking in Persons to bolster its anti-trafficking efforts. In addition, it doubled the number of labor inspections carried out in 2022 compared to the previous year. However, children in Comoros are subjected to the worst forms of child labor, including forced labor in agriculture. Children also perform dangerous tasks in domestic work. Comoros' Labor Code applies only to workers with a formal work agreement, leaving child laborers, particularly those in the informal sector, vulnerable to exploitation. In addition, the legal framework defines child trafficking as requiring the use of force, fraud, or coercion, which does not conform with international standards. Finally, Comoros lacks a policy that addresses all relevant worst forms of child labor.



I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

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 (%)		76.7

Source for primary completion rate: Data from 2017, published by UNESCO Institute for Statistics, 2023. (1)

Source for all other data: International Labor Organization's analysis of statistics from Demographic and Health Survey (DHS), 2012. (2)

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† (3-5)
	Animal husbandry† (3,5)
	Fishing† (3,5)
Industry	Construction,† including in carpentry† (3,5)
	Extracting and selling marine sand (3-6)
Services	Domestic work† (3,5)
	Street vending (3,5,7)
	Repairing cars† and bicycles,† including tire vulcanization† and battery charging† (4,7)
Categorical Worst Forms of Child Labor‡	Forced labor in domestic work, construction, street vending, baking, fishing, agriculture, and in illicit activities, such as drug trafficking (3-5,8-10)

† Determined by national law or regulation as hazardous and, as such, relevant to Article 3(d) of ILO C. 182.

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

Data detailing the prevalence of children engaged in child labor in Comoros were not available for inclusion in this report. However, reports suggest that some children are subjected to domestic servitude and forced labor in the agricultural and fishing sectors. (5, 11) Children from poor or rural families are at higher risk of being

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placed into forced labor. (3,12) Some parents who are unable to care for their children send them to wealthier families, who are expected to provide food, shelter, and schooling for the children in exchange for housework. In practice, some may become domestic workers and victims of labor trafficking. (3,5,12) In addition, in Comoros, it is traditional practice to send children to Koranic teachers to receive an education. Some Koranic teachers, however, may force their students to perform domestic or agricultural work, and some children are sexually and physically abused. (5-7,12) In nearby Mayotte, which is administered by France, reports indicate that there are more than 3,000 unaccompanied children from Comoros, some of whom are exploited in child labor or may be vulnerable to human trafficking. (12,13) There are also reports that drug traffickers use Comoran teenagers to transport drugs on boats to Mayotte. (3,5,9)







Children in Comoros often work on family farms or family fishing boats, performing agricultural tasks with sharp tools, carrying heavy loads of products, and climbing tall heights to harvest fruit. In construction, children work without basic safety or protective equipment. (3,5,9)

Although boys and girls attend public primary schools in equal numbers, fewer girls complete primary education. Due to a lack of facilities to accommodate female menstrual cycles, girls often miss school or leave altogether. (3,5,14,15) Furthermore, poor school infrastructure, the limited availability of teachers, and physical and sexual violence in schools may impede access to education and increase the vulnerability of children to child labor. (5,6,9)

II. LEGAL FRAMEWORK FOR CHILD LABOR

Comoros has ratified all 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	✓

In June 2021, Comoros ratified the Forced Labor Protocol, which commits the country to taking effective measures to prevent forced labor, protect survivors, and ensure survivors have access to judicial recourse. The Protocol entered into effect on July 15, 2022. (16)

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 the lack of minimum age protections for all children.

Table 4. Laws and Regulations on Child Labor

Standard	Meets International Standards	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 the Law to Combat Child Labor and Trafficking (17,18)

Table 4. Laws and Regulations on Child Labor (Cont.)

Standard	Meets International Standards	Age	Legislation
Identification of Hazardous Occupations or Activities Prohibited for Children	Yes		List of Dangerous Occupations; Article 131(d) of the Labor Code; Article 7 of the Law to Combat Child Labor and Trafficking (17-19)
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	No		Article 131 of the Labor Code; Articles 13 and 14 of the Law to Combat Child Labor and Trafficking; Article 266-11 of the Penal Code (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 the Law to Combat Child Labor and Trafficking (17,18)
Minimum Age for Voluntary State Military Recruitment	Yes	18	Articles 41, 52, and 58 of Law No. 97-006/AF (21)
Prohibition of Compulsory Recruitment of Children by (State) Military	N/A*		
Prohibition of Military Recruitment by Non-state Armed Groups	Yes		Article 6(a) of the Law to Combat Child Labor and Trafficking (18)
Compulsory Education Age	Yes	16	Article 2 of the Outline Act on the Education System; Article 4 on the Decree on Education Policy (22,23)
Free Public Education	No		Article 1 of the Outline Act on the Education System; Preamble of the Constitution (22,24)

* Country has no conscription (25)

Comoros' Law to Combat Child Labor and Trafficking defines child trafficking as requiring the use of force, fraud, or coercion, which does not conform with international standards. (18,26) While the Labor Code does not stipulate this requirement, it also does not exclude the means of force, fraud, or coercion for child trafficking victims. (17,18,27) The 2020 Penal Code also does not exclude the means of force, fraud, or coercion for child trafficking victims. (28) Thus, relevant Comoran laws do not meet international standards.

The Labor Code allows children under age 15 to perform light work in domestic work or agriculture if it does not interfere with their education or physical or moral development. The Labor Code, however, does not set age 13 as the minimum age for light work, 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. (17,22,27) In addition, the Labor Code applies only to workers who perform work under a formal employment agreement, which does not conform to international standards requiring that all children be protected under the law establishing a minimum age for work. (17,27)

Although education is compulsory from ages 3 to 16 in Comoros, there is no free basic education for children in Comoros as established by law. This, in addition to a lack of infrastructure, teachers, and transportation hamper schooling and retention of children, increases the risk of children's involvement in child labor. (5,6,22,29) Furthermore, as the minimum age for work is lower than the compulsory education age, children may be encouraged to leave school before the completion of compulsory education.

III. ENFORCEMENT OF LAWS ON CHILD LABOR

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

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Table 5. Agencies Responsible for Child Labor Law Enforcement

Organization/Agency	Role & Activities
Ministry of Labor (MOL)	Enforces child labor laws, investigates allegations of child labor, and refers cases of the worst forms of child labor for criminal investigation. (5,6,27)
Ministry of the Interior	Oversees the National Brigade for the Repression of Illegal Migrant Smuggling and Trafficking in Persons*. Established in March of 2022, and is composed of 16 officers from the police, gendarmerie, and civil security. (13,30) Responsible for investigating human trafficking cases and coordinating with IOM, <i>Service d'Ecoute</i> , and civil protection to provide trafficking survivors with social services. (13,31) The Police Morals and Minors Brigade, also operating under the Ministry, investigates allegations of child abuse, including child trafficking, and refers cases for prosecution. (5,32)
Ministry of Justice	Prosecutes criminal cases, including those related to child trafficking. Has specialized courts for minors, with judges responsible for the prosecution of cases involving forced labor, child trafficking, commercial sexual exploitation, and the use of children in illicit activities. (5-7)

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

Labor Law Enforcement

In 2022, labor law enforcement agencies in Comoros took actions to address child labor (Table 6). However, gaps exist within the operations of the Ministry of Labor (MOL) that may hinder adequate labor law enforcement, including insufficient allocation of financial resources.

Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	2021	2022
Labor Inspectorate Funding	0 (3)	0 (5)
Number of Labor Inspectors	4 (3)	3 (5,32)
Mechanism to Assess Civil Penalties	Yes (17)	Yes (17)
Training for Labor Inspectors Provided	Yes (3)	Yes (5)
Number of Labor Inspections Conducted at Worksite	25 (3)	50 (5)
Number of Child Labor Violations Found	0 (3)	0 (5)
Number of Child Labor Violations for Which Penalties Were Imposed	N/A	N/A
Number of Child Labor Penalties Imposed that Were Collected	N/A	N/A
Routine Inspections Conducted	Yes (3)	Yes (5)
Routine Inspections Targeted	Yes (3)	Yes (5)
Unannounced Inspections Permitted	Yes (17)	Yes (5,17)
Unannounced Inspections Conducted	No (3)	Yes (5)
Complaint Mechanism Exists	Yes (3)	Yes (5)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Yes (3)	Yes (5)

The number of labor inspectors is likely insufficient for the size of Comoros' workforce, which includes approximately 229,000 workers. Research indicates that Comoros does not have an adequate number of labor inspectors to carry out their mandated duties. (5,33) Reports indicate that there is a lack of training, equipment, transportation, and funding available to conduct child labor inspections. (5,6,8) Inspectors have indicated that although there is a budget for fixed costs such as salaries, there is no operating budget for the labor inspectorate, and labor inspectors have to rely on their own funds for costs such as transportation. (3,5,6,9)

The labor inspectorate conducted 50 inspections during the reporting period, a 100 percent increase compared to the number of inspections carried out in 2021. (5) Although the labor inspectorate is permitted to conduct unannounced inspections, in practice, inspectors usually respond only when the MOL receives complaints. Furthermore, inspections are primarily conducted in the formal sector, even though most child labor is concentrated in the informal sector. (5) The labor inspectorate is required to submit a yearly report detailing its work, including statistics on inspections, offenses identified, and penalties imposed; however, no report of this type was identified during the reporting period. (3,5) Finally, although a reciprocal referral mechanism was established under the National Action Plan for the Elimination of the Worst Forms of Child Labor in Comoros 2010–2015, it does not appear that this mechanism is currently active. (5)

Criminal Law Enforcement

In 2022, criminal law enforcement agencies in Comoros took actions to address child labor (Table 7). However, gaps exist within the operations of the Police Morals and Minors Brigade that may hinder adequate criminal law enforcement, including insufficient allocation of financial resources.

Table 7. Criminal Law Enforcement Efforts Related to Child Labor

Overview of Criminal Law Enforcement	2021	2022
Training for Criminal Investigators Provided	No (3)	No (5)
Number of Investigations	Unknown	Unknown
Number of Prosecutions Initiated	Unknown	Unknown
Number of Convictions	Unknown	Unknown
Imposed Penalties for Violations Related to the Worst Forms of Child Labor	Unknown	Unknown
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Yes (3)	Yes (5)

In 2022, Comoros made progress in identifying trafficking victims, investigating trafficking cases, and working with international organizations to conduct anti-trafficking trainings. (13,34) In particular, the government identified trafficking victims and screened for trafficking indicators, with support from IOM, which partnered with the government to develop a manual for identifying trafficking victims. In November 2022, IOM also held a training related to trafficking victim identification, screening, and using the manual. (13,34) In addition, the Ministry of the Interior and the Ministry of Foreign Affairs, together with IOM, held anti-trafficking trainings for law enforcement and civil society organizations. However, reports indicate that prosecutors and judges have received insufficient training related to trafficking prosecutions. (34)

Since the government established the National Brigade, four potential trafficking cases have been referred to it for further investigation; with at least one case involved child trafficking. (30,31) Officers in the National Brigade noted the need for additional training related to child-friendly interviewing techniques, survivor-centered and trauma-informed approaches, and general human trafficking concepts. (31)

Reports indicate that a lack of trained staff, equipment, transportation, and funding inhibit criminal law enforcement efforts against the worst forms of child labor. (5,11,12) The government also did not provide comprehensive information on its criminal law enforcement efforts for inclusion in this report.

IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

The government has established a key mechanism 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 a failure of coordinating bodies to convene.

Table 8. Key Mechanism to Coordinate Government Efforts on Child Labor

Coordinating Body	Role & Activities
National Committee Against Child Labor	Coordinates government efforts on child labor. Chaired by MOL. (7,35) Research was unable to determine whether the committee was active during the reporting period.

The National Committee on the Prevention of Illegal Migrant Smuggling and Trafficking in Persons was established in March 2022 to lead government efforts to apply anti-trafficking policies, replacing the Anti-Trafficking Task Force. The National Committee operates under the direction of the Ministry of Foreign Affairs and comprises multiple government agencies, the *Services d'Ecoute*, NGOs, and international organizations. (13,31)

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 the lack of a policy specifically dedicated to addressing child labor.

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Table 9. Key Policies Related to Child Labor

Policy	Description & Activities
National Policy for the Protection of Children (2016–2021)	Aimed to improve child protection in Comoros; included components to address the worst forms of child labor, with a focus on child trafficking. Implemented by the Ministry of Health, Solidarity, Social Protection, and Gender Promotion. (7,35,37) Research was unable to determine whether activities were undertaken to implement this policy during the reporting period.

‡ The government has other policies that may have addressed child labor issues. (38)

Although child labor is integrated into some government policies, Comoros has not adopted a new national action plan to address child labor since the previous plan expired in 2021. (5,11)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2022, 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 inadequate efforts to address child labor in all sectors.

Table 10. Key Social Programs to Address Child Labor

Program	Description & Activities
<i>Services d'Ecoute</i> (Listening Services)†	UNICEF-funded, government-backed centers that provide protective services and offer immediate assistance to vulnerable and abused children. (5,11,39) Investigates allegations of violence against children, including the worst forms of child labor, and refers perpetrators to criminal authorities for prosecution. (9,40) An independent evaluation of <i>Services d'Ecoute</i> found that it responded to the needs of child survivors of violence and improved the professionalism of those responding to child survivors. However, program personnel lack relevant training in social services provision and in international standards on child protection, which has resulted in incomplete casework, and a lack of evaluation and follow-up with child survivors. (39,41)

For information about USDOL's projects to address child labor around the world, visit <https://www.dol.gov/agencies/ilab/ilab-project-page-search>

† Program is funded by the Government of Comoros.

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

While the *Services d'Ecoute* may provide assistance services to children, these services are designed to address cases involving violence against children rather than child labor issues. (3,5)

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	Ensure that the law's light work provisions set age 13 as the minimum age, 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 – 2022
	Establish by law the right to free basic education.	2020 – 2022
	Ensure that the law's minimum age for work provisions and protections apply to children in unpaid or non-contractual work.	2015 – 2022
	Align child trafficking laws with international standards by ensuring that force, fraud, or coercion are not required elements in child trafficking cases.	2019 – 2022
Enforcement	Raise the minimum age for work from age 15 to age 16 to align with the compulsory education age.	2021 – 2022
	Provide the labor inspectorate with an operating budget for resources, training, transportation, and equipment to ensure adequate coverage of the workforce.	2009 – 2022
	Increase the number of labor inspectors from 3 to 6 to ensure adequate coverage of a labor force of approximately 229,000 people.	2018 – 2022

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

Area	Suggested Action	Year(s) Suggested
Enforcement	Ensure that labor inspectors expand their coverage of the informal sector.	2020 – 2022
	Ensure that the labor inspectorate uses its authority to conduct unannounced inspections rather than relying solely on incoming complaints to initiate inspections.	2017 – 2022
	Ensure that the labor inspectorate fulfills its mandate to collect and publish data and statistics related to inspection efforts on an annual basis.	2019 – 2022
	Establish and use a reciprocal survivor referral mechanism between labor enforcement authorities and social services.	2019 – 2022
	Publish information on the number of criminal law investigations, prosecutions initiated, convictions, and penalties assessed related to cases of the worst forms of child labor.	2009 – 2022
	Provide additional trainings to criminal law enforcement personnel and judges, as well as expand the allocation of resources, transportation, and equipment, to enhance criminal law enforcement efforts related to the worst forms of child labor.	2009 – 2022
Coordination	Ensure that the National Committee Against Child Labor carries out its intended mandate.	2014 – 2022
Government Policies	Adopt a policy that addresses all relevant worst forms of child labor, such as a new national action plan to combat child labor.	2016 – 2022
	Ensure that activities are undertaken to implement key policies related to child labor and that data on these activities are published on an annual basis.	2019 – 2022
Social Programs	Enhance efforts to eliminate barriers to education, by offering appropriate facilities to meet the needs of girls, improving infrastructure and teacher availability, and addressing school violence.	2014 – 2022
	Collect and publish data on the prevalence of child labor and the types of work children perform in Comoros.	2019 – 2022
	Ensure that social program personnel, such as those in the <i>Services d'Ecoute</i> , have adequate and relevant training to be able to appropriately respond to the needs of child survivors, including those abused by religious instructors.	2019 – 2022
	Implement and expand existing programs to address the scope of the child labor problem, particularly in agriculture, fishing, domestic work, and informal work.	2009 – 2022

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