

# Comoros

## MINIMAL ADVANCEMENT – EFFORTS MADE BUT CONTINUED PRACTICE THAT DELAYED ADVANCEMENT

In 2024, Comoros made minimal advancement in efforts to eliminate the worst forms of child labor. The government adopted the National Action Plan to Combat Human Trafficking in collaboration with the United Nations, which consists of a strategic roadmap that will aid in preventing human trafficking. However, despite this initiative, Comoros is assessed as having made only minimal advancement because in 2024 the labor inspectorate conducted zero worksite inspections. Labor inspections are a key tool for identifying child labor violations, and their absence makes children more vulnerable to child labor. In addition, Comoros’ Labor Code applies only to workers with formal work agreements, leaving child laborers, particularly those working in the informal sector, vulnerable to exploitation. Comoros also lacks a policy that addresses all relevant worst forms of child labor in the country.

## PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Statistics on Children’s Work and Education		
Children	Age	Percent and Population
Working	5 to 14	11.7% (Unavailable)
Boys		12.9%
Girls		10.5%
Urban		6.8%
Rural		13.8%
Hazardous Work by Children	15 to 17	0.6% (Unavailable)
Boys		1.0%
Girls		0.1%
Urban		0.9%
Rural		0.4%
Attending School	5 to 14	87.5%
Combining Work and School	7 to 14	14.8%

Children in Comoros are subjected to the worst forms of child labor, including forced labor in agriculture and in illicit activities. Children also perform dangerous tasks in construction, carpentry, and domestic work.

Overview of Children’s Work by Sector and Activity	
Agriculture	Animal husbandry† and fishing.†
Industry	Construction† and carpentry.†
Services	Domestic work.† Street vending. Repairing cars† and bicycles,† including tire vulcanization† and battery charging.†
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.

† 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.

## SUGGESTED GOVERNMENT ACTIONS TO ELIMINATE CHILD LABOR

The suggested government actions below would close gaps USDOL has identified in Comoros' implementation of its international commitments to eliminate the worst forms of child labor.

Area	Suggested Action
Legal Framework	Ensure the minimum age for work applies to all children, including children in unpaid or non-contractual work, and ensure that the law's light work provisions set age 13 as the minimum age for light work, prescribe the number of hours per week that light work may be performed, and specify the conditions under which light work may be conducted, as defined by international standards on child labor
	Establish by law the right to free basic education.
	Raise the minimum age for work from age 15 to age 16 to align with the compulsory education age.
Enforcement	Provide the labor inspectorate with an operating budget for resources, training, transportation, and equipment. Increase the number of labor inspectors from 3 to 7 inspectors to ensure adequate coverage of the labor force of approximately 272,000 people, and offer regular refresher training on the concepts of child labor law enforcement.
	Conduct unannounced inspections in sectors in which child labor is likely present, such as the informal sector in domestic work, rather than relying solely on incoming complaints to initiate inspections.
	Ensure that the labor inspectorate fulfills its mandate to collect and publish data related to inspection efforts on an annual basis.
	Implement a digital tracking system for labor inspections.
	Provide additional trainings to criminal law enforcement personnel and judges, including appropriate training on new laws related to child labor, and expand the allocation of resources, transportation, and equipment, to enhance criminal law enforcement efforts related to the worst forms of child labor.
Coordination	Ensure that the National Committee Against Child Labor carries out its intended mandate.
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.
	Undertake activities to implement key policies related to child labor and ensure that data on these activities are published on an annual basis.
Social Programs	Enhance efforts to eliminate barriers to education, by offering appropriate facilities to meet the needs of girls, improving infrastructure, hiring more teachers, and addressing school violence.
	Collect and publish data on the types of work children perform in Comoros.
	Ensure that social program personnel, such as those in the <i>Services d'Ecoute</i> , have adequate training to be able to appropriately respond to the needs of child survivors.
	Implement and expand existing programs to address the scope of the child labor problem, particularly in agriculture, fishing, domestic work, and the informal sector.

## CHILDREN AT HIGHER RISK

Children from poor or rural families are at higher risk of being placed into forced labor. 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. These children are also at times sexually and physically abused. In addition, it is traditional practice to send children to Koranic teachers to receive an education in Comoros. However, some Koranic teachers force their students to perform domestic or agricultural work.

## BARRIERS TO EDUCATION ACCESS

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. Furthermore, poor school infrastructure, a lack of teachers, and physical and sexual violence in schools may impede access to education and increase the vulnerability of children to child labor.

## LEGAL FRAMEWORK FOR CHILD LABOR

Comoros has ratified all key international conventions concerning child labor. However, Comoros' 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.

Laws and Regulations on Child Labor			
Standard	Age	Meets International Standards	Legislation
Minimum Age for Work	15	X	Article 1 and 129 of the Labor Code
Minimum Age for Hazardous Work	18	✓	Article 131(d) of the Labor Code; Article 7 of the Law to Combat Child Labor and Trafficking
Identification of Hazardous Occupations or Activities Prohibited for Children		✓	List of Dangerous Occupations; Article 131(d) of the Labor Code; Article 7 of the Law to Combat Child Labor and Trafficking
Prohibition of Slavery, Debt Bondage, and Forced Labor		✓	Articles 2.1 and 131 of the Labor Code; Articles 6, 8, 13, and 14 of the Law to Combat Child Labor and Trafficking; Article 266-11 of the Penal Code
Prohibition of Child Trafficking		✓	Article 131 of the Labor Code; Articles 6, 8, 13, and 14 of the Law to Combat Child Labor and Trafficking; Articles 266-11, 266-12, and 353 of the Penal Code; Article 3 of Law N° 24-009/AU
Prohibition of Commercial Sexual Exploitation of Children		✓	Article 131 of the Labor Code; Articles 6, 8–11, and 13 of the Law to Combat Child Labor and Trafficking; Articles 322 and 323 of the Penal Code
Prohibition of Using Children in Illicit Activities		✓	Article 131(c) of the Labor Code; Article 6(c) of the Law to Combat Child Labor and Trafficking
Minimum Age for Voluntary State Military Recruitment	18	✓	Articles 41, 52, and 58 of Law No. 97-006/AF
Prohibition of Compulsory Recruitment of Children by (State) Military		N/A*	
Prohibition of Military Recruitment by Non-state Armed Groups		✓	Article 6(a) of the Law to Combat Child Labor and Trafficking
Compulsory Education Age	16	✓	Articles 1, 2, and 12 of the Outline Act on the Education System; Article 4 of the Decree on Education Policy
Free Public Education		X	Articles 1 and 3 of the Outline Act on the Education System; Preamble of the Constitution

\* Country has no conscription

Comoros' 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. In addition, 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. However, it does not set age 13 as the minimum age for light work, specify the conditions under which light work may be performed, or limit the number of hours for light work, as required by international standards on child labor. Furthermore, Comoros' Law to Combat Child Labor and Trafficking defines child trafficking as requiring the use of force, fraud, or coercion, which does not conform to international standards. 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. The 2020 Penal Code also does not exclude the means of force, fraud, or coercion for child trafficking victims.

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 the barriers to education access noted in the section above, increases the risk of children’s involvement in child labor. Furthermore, as the minimum age for work is lower than the compulsory education age, children may be encouraged to leave school before completing compulsory education.

ENFORCEMENT OF LAWS ON CHILD LABOR

It is unknown whether enforcement agencies in Comoros took documented actions to address child labor in 2024. In addition, an absence of worksite inspections and insufficient financial resources hindered enforcement efforts.

Agencies Responsible for Child Labor Law Enforcement	
<b>Ministry of Labor:</b>	Enforces child labor laws, investigates allegations of child labor, and refers cases of the worst forms of child labor for criminal investigation. Reports indicate the labor inspectorate lacks training, equipment, transportation, and funding to conduct child labor inspections.
<b>Ministry of Justice:</b>	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.

Enforcement Mechanisms and Efforts	
Has a Labor Inspectorate	Yes
Able to Assess Civil Penalties	Yes
Routinely Conducted Worksite Inspections	No
Unannounced Inspections Permitted	Yes
Has a Complaint Mechanism	Yes
Imposed Penalties for Child Labor Violations	No
Conducted Criminal Investigations for Worst Forms of Child Labor Crimes	Yes
Imposed Penalties for Worst Forms of Child Labor Crimes	Yes

In 2024, 3 labor inspectors conducted 0 labor inspections due to a lack of resources to carry out inspections. The government also conducted 1 investigation into suspected cases of the worst forms of child labor, initiated 1 prosecution, and convicted 1 perpetrator.

COORDINATION, POLICIES, AND PROGRAMS

Comoros established a mechanism to coordinate its efforts to address child labor. However, it is unclear whether the coordinating body convened during the reporting period.

Key Mechanism to Coordinate Government Efforts on Child Labor	
<b>National Committee Against Child Labor:</b>	Coordinates government efforts on child labor. Chaired by the Minister of Labor. The committee did not undertake any activities during the reporting period due to a lack of resources.

Comoros established a policy related to child labor. However, the country lacks a national policy specifically dedicated to addressing child labor.

Key Policies Related to Child Labor	
<b>The National Action Plan to Counter Trafficking in Persons (2024–2026):</b>	Sets four strategic priorities for addressing human trafficking and migrant smuggling in collaboration with the United Nations. Priorities include: (1) prevention; (2) protection and care for victims of trafficking; (3) prosecution and enforcement; and (4) cooperation, partnerships, monitoring, and evaluation. This plan was formally adopted in May 2024.

† The government has other policies that may have addressed child labor issues.

Comoros funded and participated in programs that include the goal of eliminating or preventing child labor. However, these social programs are inadequate because they do not address child labor in all sectors.

Key Social Programs to Address Child Labor
<b>Listening Centers (Services d'Ecoute):</b> ‡ Funded by UNICEF and the government, the centers provide protective services and offer immediate assistance to vulnerable and abused children. Investigate allegations of violence against children, including the worst forms of child labor, and refer perpetrators to criminal law enforcement for prosecution. Services were active during the reporting period.
<b>Decent Work Promotion Program for the Union of Comoros (2024–2026):</b> *‡ In partnership with the ILO, aims to strengthen labor governance by reinforcing the labor inspectorate and establishing departments that are fully equipped with resources and a continuous training plan. In addition, the government plans to strengthen the application of international standards through social dialogue to build a more representative national dialogue mechanism. The program will also focus on promoting a competitive economy that creates jobs and extends social protections to all.

\* Program was launched during the reporting period.

‡ Program is funded by the Government of Comoros.

For references, please visit [dol.gov/ChildLaborReports](https://dol.gov/ChildLaborReports)