

In 2016, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The Government adopted the National Policy for the Protection of Children, which includes a component to combat the worst forms of child labor. The Government's Monitoring Group for the Fight Against Trafficking in Persons also met several times during the year and drafted a new action plan to combat human trafficking. However, children in Comoros perform dangerous tasks in agriculture. Children also engage in the worst forms of child labor, including in forced 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. In addition, limited resources for the systematic enforcement of child labor laws impede government efforts to protect children from the worst forms of child labor.



## I. PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

Children in Comoros perform dangerous tasks in agriculture. Children also engage in the worst forms of child labor, including in forced domestic work. (1-6) 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 (%)   |         | 76.4          |

Source for primary completion rate: Data from 2014, published by UNESCO Institute for Statistics, 2016.(7)

Source for all other data: Understanding Children's Work Project's analysis of statistics from Demographic and Health Survey (DHS), 2012.(8)

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† (1, 5, 6, 9, 10)        |
|   | Animal husbandry† (3)  |
|   | Fishing,† activities unknown (3, 5, 6, 9)  |
| Industry                                | Carpentry,† activities unknown (3)   |
|   | Extracting and selling marine sand† (6)  |
|   | Construction,† activities unknown (3)  |
| Services                                | Domestic work† (1-3, 9, 11, 12)  |
|   | Street work, activities unknown (3, 5)   |
|   | Repairing cars and bicycles,† including tire vulcanization† and battery charging† (3)      |
| Categorical Worst Forms of Child Labor‡ | Forced labor in domestic work, street vending, baking, fishing, and agriculture (4, 6, 10) |
|   | Commercial sexual exploitation, sometimes as a result of human trafficking (2, 4)          |

† 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 wealthier 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.(4-6, 13) In Comoros, it is a traditional practice to send children to Koranic teachers to receive an education. Some Koranic teachers, however, force their students to work; girls usually perform domestic work and boys perform agricultural labor.(4, 6, 13) In nearby Mayotte, which is administered by France, reports indicate that there are over 3,000 unaccompanied children from Comoros, some of whom are exploited in the worst forms of child labor, including commercial sexual exploitation and forced domestic work.(4, 14, 15)

Although the Constitution guarantees free compulsory primary education, this provision is not enforced effectively, and many children, especially girls, do not attend school.(6, 16) 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.(1, 6, 9, 12, 17)

## 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). The legal framework in Comoros appears to be sufficient to address and protect children from child labor.

**Table 4. Laws and Regulations on Child Labor**

| Standard  | Meets International Standards: Yes/No | Age | Legislation   |
|---|---------------------------------------|-----|---|
| Minimum Age for Work  | No                                    | 15  | Article 129 of the Labor Code (18)  |
| Minimum Age for Hazardous Work  | Yes                                   | 18  | Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (18, 19)   |
| Identification of Hazardous Occupations or Activities Prohibited for Children | Yes                                   |     | List of Dangerous Occupations; Article 131(d) of the Labor Code; Article 7 of Law to Combat Child Labor and Trafficking (18-20)                           |
| 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 (18, 19)  |
| Prohibition of Child Trafficking  | Yes                                   |     | Article 131 of the Labor Code; Article 13 of the Law to Combat Child Labor and Trafficking (18, 19)   |
| 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 (18, 19, 21) |
| 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 (18, 19)  |
| Minimum Age for Compulsory Military Recruitment                               |                                       |     |   |
| State Compulsory  | N/A*                                  |     |   |
| State Voluntary   | Yes                                   | 18  | Article 41 of Law No. 97-06/AF (22)   |

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

| Standard                 | Meets International Standards: Yes/No | Age | Legislation   |
|--------------------------|---------------------------------------|-----|---|
| Non-state Compulsory     | Yes                                   |     | Article 6(a) of Law to Combat Child Labor and Trafficking(19)                               |
| Compulsory Education Age | Yes                                   | 12  | Article 2 of the Outline Act on the Education System (23)                                   |
| Free Public Education    | Yes                                   |     | Article 1 of the Outline Act on the Education System; Preamble of the Constitution (23, 24) |

\* No conscription (25)

The Government has drafted a Penal Code and a Code of Criminal Procedures that increase the penalties for human trafficking crimes and has also submitted a proposal to ratify the Palermo Protocol on Trafficking in Persons; however, neither of these legislative proposals was enacted during the reporting period.(4, 15, 26, 27)

The Labor Code allows children under the minimum age to perform light work in domestic work or agriculture as long as it does not interfere with education or with physical or moral development.(18) The Labor Code, however, does not 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.(28) 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.(5, 28)

Children in Comoros are required to attend school only up to age 12. This standard makes children ages 13 through 15 vulnerable to the worst forms of child labor as they are not required to attend school but are not legally permitted to work.(29, 30)

### 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). However, gaps in labor law and criminal law enforcement remain and some enforcement information is not available.

**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 of the worst forms of child labor for criminal investigation.(3, 4, 6) |
| Police Morals and Minors Brigade                          | Investigate allegations of child abuse, including child trafficking, and refer cases for prosecution.(3, 4)  |
| Ministry of Justice (MOJ)                                 | Prosecute criminal cases, including those related to child trafficking.(3, 15)   |
| National Commission for Human Rights and Freedoms (CNDHL) | Receive complaints of the worst forms of child labor, investigate violations, and refer cases to the MOJ for prosecution.(3, 31)                         |

#### *Labor Law Enforcement*

In 2016, labor law enforcement agencies in Comoros did not take actions to combat child labor, including its worst forms (Table 6).

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

| Overview of Labor Law Enforcement           | 2015     | 2016     |
|---|----------|----------|
| Labor Inspectorate Funding                  | Unknown  | Unknown  |
| Number of Labor Inspectors                  | 4 (10)   | 4 (3)    |
| Inspectorate Authorized to Assess Penalties | Yes (10) | Yes (10) |
| Training for Labor Inspectors               |          |          |
| Initial Training for New Employees          | No (10)  | N/A      |
| Training on New Laws Related to Child Labor | N/A      | N/A      |
| Refresher Courses Provided                  | No (10)  | No (3)   |
| Number of Labor Inspections                 | 0 (10)   | 0 (3)    |
| Number Conducted at Worksite                | 0 (10)   | 0 (3)    |
| Number Conducted by Desk Reviews            | 0 (10)   | 0 (3)    |
| Number of Child Labor Violations Found      | 0 (10)   | 0 (3)    |

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

| Overview of Labor Law Enforcement  | 2015    | 2016    |
|--|---------|---------|
| 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 (10) | No (10) |
| Routine Inspections Targeted   | N/A     | N/A     |
| Unannounced Inspections Permitted  | Unknown | Unknown |
| Unannounced Inspections Conducted  | No (10) | No (10) |
| Complaint Mechanism Exists   | Unknown | No (3)  |
| Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services | Unknown | Unknown |

In 2016, the Ministry of Labor (MOL) employed four labor inspectors: two in Grand Comore, one for Anjouan, and one for Mohéli.(3) The number of labor inspectors is insufficient for the size of Comoros’s workforce, which includes over 245,000 workers. According to the ILO recommendation of 1 inspector for every 40,000 workers in less developed economies, Comoros should employ about 6 inspectors.(10, 32-34) Reports indicate there is a lack of equipment, transportation, and funding available to conduct child labor inspections and legal proceedings.(3, 6, 15)

### *Criminal Law Enforcement*

In 2016, 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  | 2015    | 2016      |
|---|---------|-----------|
| Training for Investigators  |         |           |
| Initial Training for New Employees  | No (10) | No (3)    |
| Training on New Laws Related to the Worst Forms of Child Labor                        | N/A     | N/A       |
| Refresher Courses Provided  | No (10) | No (3)    |
| Number of Investigations  | 0 (35)  | 0 (3, 15) |
| Number of Violations Found  | 0 (35)  | 0 (3)     |
| Number of Prosecutions Initiated  | 0 (35)  | 0 (3, 15) |
| Number of Convictions   | 0 (35)  | 0 (3, 15) |
| Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services | Unknown | No (5)    |

Reports indicate that a lack of trained staff, equipment, transportation, and funding inhibit criminal law enforcement efforts on the worst forms of child labor.(1, 4, 5, 15) 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.(5)

## **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. Key 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. Chaired by the Ministry of Labor.(12, 13, 28, 36)  |
| Monitoring Group for the Fight Against Trafficking in Persons | Coordinate actions against human trafficking and implement the Anti-Trafficking in Persons Action Plan. Headed by the Secretary General of the Government and includes representatives from the MOL, MOJ, CNDHL, and police.(4, 5, 10) In 2016, met several times to draft a new Action Plan.(4) |

The National Committee Against Child Labor was inactive during the reporting period.(37)

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

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

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

| Policy  | Description  |
|---|--|
| Anti-Trafficking in Persons Action Plan                                 | Includes the goals of enhancing the legal framework to prevent human trafficking and commercial sexual exploitation and providing effective protection and care for victims.(5, 13, 38) In 2016, the TIP Task Force drafted a new action plan, which was not validated because of the presidential elections.(4, 15, 35) |
| National Policy for the Protection of Children (2016–2021) <sup>†</sup> | Aims to improve child protection in Comoros; includes components to combat the worst forms of child labor, with a focus on child trafficking. Led by the Ministry of Health.(3)  |
| 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.(4, 26, 39)   |

<sup>†</sup> Policy was approved during the reporting period.

In 2016, the National Action Plan to Combat Child Labor remained unfunded.(37)

## VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2016, 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. Key Social Programs to Address Child Labor**

| Program                                 | Description   |
|---|---|
| Child Protection Units <sup>†</sup>     | 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.(4, 5, 26)  |
| Decent Work Country Program (2015–2019) | Program that aims to guarantee labor rights and extend social protection programs for vulnerable populations, including by improving the operational environment for the elimination of child labor and its worst forms.(11) Overseen by the MOL and supported by the ILO. In 2016, conducted raising awareness campaigns to improve access to decent work for youth.(11, 40) |
| UNICEF Country Program (2015–2019)      | \$20,885 UNICEF-funded program that supports the Government's efforts to strengthen children's rights to survival, development, education, protection, and social inclusion.(1, 26). In 2016, continued to fund shelters for victims of the worst forms of child labor operated by the NGO <i>Service d'Ecoute</i> .(3, 12)   |

<sup>†</sup> Program is funded by the Government of Comoros.

Although the Government has in place programs that target child labor, their scope is insufficient to fully address the extent of the problem, particularly in agriculture and domestic work.(15) Comoros also lacks a specific program to assist children exploited by religious instructors.

## 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 – 2016       |
|                 | Ensure that the law's light work provisions 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 – 2016       |
|                 | Ensure that the law's minimum age provisions and protections apply to children in unpaid or non-contractual work.   | 2015 – 2016       |
| Legal Framework | Raise the compulsory education age to 15 to be equivalent to the minimum age for work.  | 2009 – 2016       |

**Table 11. Suggested Government Actions to Eliminate Child Labor, Including its Worst Forms (cont)**

| Area                | Suggested Action   | Year(s) Suggested |
|---------------------|--|-------------------|
| Enforcement         | Carry out inspections and criminal investigations to enforce compliance with the laws that address child labor.  | 2009 – 2016       |
|                     | 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 – 2016       |
|                     | Publish information on the labor inspectorate’s funding, the number of criminal investigators, law violations and penalties assessed, and criminal investigations, prosecutions, and convictions related to cases of the worst forms of child labor. | 2009 – 2016       |
|                     | Establish referral mechanisms between labor and criminal law enforcement agencies and social welfare entities.   | 2014 – 2016       |
| Coordination        | Ensure that the National Committee Against Child Labor actively carries out its responsibilities related to the worst forms of child labor.  | 2014 – 2016       |
| Government Policies | Fund and implement the National Action Plan to Combat Child Labor.   | 2016              |
| Social Programs     | Enhance efforts to eliminate barriers and make education accessible for all children, including girls, by increasing school infrastructure and teacher availability.   | 2014 – 2016       |
|                     | Conduct research to determine the activities carried out by children working in fishing, carpentry, construction, and street work to inform policies and programs.   | 2016              |
|                     | Expand existing programs to address the scope of the child labor problem, particularly in agriculture and domestic work.   | 2009 – 2016       |
|                     | Implement a program to assist children exploited by religious instructors.   | 2016              |

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33. ILO. *Strategies and Practice for Labour Inspection*. Geneva, Committee on Employment and Social Policy; November 2006. <http://www.ilo.org/public/english/standards/relm/gb/docs/gb297/pdf/esp-3.pdf>. Article 10 of ILO Convention No. 81 calls for a "sufficient number" of inspectors to do the work required. As each country assigns different priorities of enforcement to its inspectors, there is no official definition for a "sufficient" number of inspectors. Amongst the factors that need to be taken into account are the number and size of establishments and the total size of the workforce. No single measure is sufficient but in many countries the available data sources are weak. The number of inspectors per worker is currently the only internationally comparable indicator available. In its policy and technical advisory services, the ILO has taken as reasonable benchmarks that the number of labor inspectors in relation to workers should approach: 1/10,000 in industrial market economies; 1/15,000 in industrializing economies; 1/20,000 in transition economies; and 1/40,000 in less developed countries.
34. UN. *World Economic Situation and Prospects 2012 Statistical Annex*. New York; 2012. [http://www.un.org/en/development/desa/policy/wesp/wesp\\_current/2012country\\_class.pdf](http://www.un.org/en/development/desa/policy/wesp/wesp_current/2012country_class.pdf). For analytical purposes, the Development Policy and Analysis Division (DPAD) of the Department of Economic and Social Affairs of the United Nations Secretariat (UN/DESA) classifies all countries of the world into one of three broad categories: developed economies, economies in transition, and developing countries. The composition of these groupings is intended to reflect basic economic country conditions. Several countries (in particular the economies in transition) have characteristics that could place them in more than one category; however, for purposes of analysis, the groupings have been made mutually exclusive. The list of the least developed countries is decided upon by the United Nations Economic and Social Council and, ultimately, by the General Assembly, on the basis of recommendations made by the Committee for Development Policy. The basic criteria for inclusion require that certain thresholds be met with regard to per capita GNI, a human assets index and an economic vulnerability index. For the purposes of the Findings on the Worst Forms of Child Labor Report, "developed economies" equate to the ILO's classification of "industrial market economies; "economies in transition" to "transition economies," "developing countries" to "industrializing economies, and "the least developed countries" equates to "less developed countries." For countries that appear on both "developing countries" and "least developed countries" lists, they will be considered "least developed countries" for the purpose of calculating a "sufficient number" of labor inspectors.
35. U.S. Embassy- Antananarivo. *reporting, February 26, 2016*.
36. 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. source on file.
37. U.S. Embassy- Antananarivo. *reporting, March 02, 2017*.
38. Government of Comoros. *Lettre d'engagement et plan d'action sur la traite des être humains*. Moroni; May 24, 2013. source on file.
39. Government of Comoros. *Strategie de Croissance Acceleree et de Developpement Durable (SCA2D)*. Moroni; January 27, 2015. Source on file.
40. International Trade Union Confederation. *World Day for Decent Work-CTC Comores*. September 20, 2016. <http://www.ituc-csi.org/ctc-comores>.