

In 2019, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The National Assembly passed legislation authorizing the president to ratify the Palermo Protocol, which the president did in January 2020. Comoros also created the National Commission for Solidarity, Social Protection, and the Promotion of Gender to improve cooperation with state and non-state actors involved in child protection. In addition, services for child victims of violence were expanded with the opening of a new center under the Services d'Ecoute (Listening and Counseling Services) program. However, children in Comoros engage in the worst forms of child labor, including forced labor in agriculture. Children also perform dangerous tasks in domestic work. Furthermore, labor and criminal investigators lack the resources and funds necessary to enforce laws related to the worst forms of child labor, and Comoros lacks national action plans to combat child labor and trafficking in persons. 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 engage in the worst forms of child labor, including forced labor in agriculture. Children also perform dangerous tasks in domestic work. (1-4) 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, 2020. (5)

Source for all other data: International Labor Organization's analysis of statistics from Demographic and Health Survey, 2012. (6)

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† (7,8)
	Animal husbandry† (3,8)
	Fishing† (2,3,8)
Industry	Construction,† including in carpentry† (3,8)
	Extracting and selling marine sand† (7)
Services	Domestic work† (1,3,8-10)
	Street vending (2,3,11,12)
	Repairing cars† and bicycles,† including tire vulcanization,† and battery charging† (3,7)
Categorical Worst Forms of Child Labor‡	Forced labor in domestic work, street vending, baking, fishing, and agriculture (7,8,12,13)

† 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.

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National figures detailing the prevalence of children engaged in the worst forms of child labor in Comoros are not available; however, anecdotal reports suggest that children are involved in domestic servitude and also work in the agricultural and fishing sectors. (8) Children from poor or rural families are at higher risk of being placed into forced labor. (14) Some parents who are unable to care for their children send them to wealthier families, who are expected to provide food, shelter, and schooling to the children in exchange for housework. In practice, many become domestic workers and are victims of labor exploitation and abuse. (2,3,8,14,15) In Comoros, it is a traditional practice to send children to Quranic teachers to receive an education. Some Quranic teachers, however, may force their students to work rather than attend school, or earn funds to pay a school fee; girls usually perform domestic work, and boys perform agricultural labor. (3,4,12,14,15) 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 the worst forms of child labor or may be vulnerable to trafficking. (12,14,16)

Children performing agricultural tasks work with sharp tools, carry heavy loads of products, and may have to climb tall heights to harvest fruit. In construction, children work without basic safety or protective equipment. (8) There were reports during the reporting period that drug traffickers used teenagers to transport drugs on boats to Mayotte. (8)

The law establishes compulsory education between ages 6 and 12, and children under the age of 14 cannot be prevented from attending school. However, no law establishes free basic education. (17) Additionally, schools lack sufficient capacity and thus prevent some children, particularly poor and disadvantaged children, from enrolling. (17) Although approximately equal numbers of boys and girls attended public primary schools, fewer girls completed primary education. (17,18) Furthermore, poor school infrastructure, limited availability of teachers, and physical and sexual violence in schools may impede access to education, which may increase the vulnerability of children to the worst forms of child labor. (8,10,18)

II. LEGAL FRAMEWORK FOR CHILD LABOR

During the reporting period, the National Assembly passed Law No. 19-04/AU, which authorized the president to ratify the Palermo Protocol on Trafficking in Persons. On January 25, 2020, the President of Comoros issued Decree No. 20-024-PR, which allowed Comoros to begin the ratification process with the UN. (8,14) Comoros officially acceded to the Protocol in June of 2020. (52) Comoros has thus 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	✓

The government has established laws and regulations related to child labor (Table 4). However, gaps exist in Comoros's legal framework to adequately protect children from the worst forms of child labor, including the minimum age for work and the compulsory education age.

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 (19)
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 (19,20)
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 (19-21)
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 (19,20)
Prohibition of Child Trafficking	No		Article 131 of the Labor Code; Articles 13 and 14 of the Law to Combat Child Labor and Trafficking (19,20)
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 322–323 of the Penal Code (19,20,22)
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 (19,20)
Minimum Age for Voluntary State Military Recruitment	Yes	18	Article 41 of Law No. 97-06/AF (23)
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 (20)
Compulsory Education Age	No	12	Article 2 of the Outline Act on the Education System (24)
Free Public Education	No		Article 1 of the Outline Act on the Education System; Preamble of the Constitution (24,25)

* No conscription (26)

The government has drafted a Penal Code and a Code of Criminal Procedures that increase the penalties for human trafficking crimes; however, this legislative proposal was not enacted during the reporting period. (8,26-30)

The Labor Code allows children under age 15 to perform light work in domestic work or agriculture if it does not interfere with education or physical or moral development. (24) The Labor Code, however, does not set 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. (31) In addition, the Labor Code applies only to workers who perform work under a formal employment agreement, which does not conform to international standards which require that all children be protected under the law establishing a minimum age for work. (2,31)

Comoros's Law to Combat Child Labor and Trafficking defines child trafficking as requiring the use of force, fraud, or coercion. (20) While the Labor Code does not make this requirement, it also does not exclude the means of force, fraud, or coercion for child trafficking victims. Thus, Comoros's child trafficking laws do not meet international standards. (19,20,32)

Children in Comoros are required to attend school only up to age 12. (17,24,32) This standard makes children ages 13 through 15 vulnerable to the worst forms of child labor because they are not required to attend school but are not legally permitted to work.

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 the Ministry of Labor 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
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. (3,4,18)
Police Morals and Minors Brigade	Investigates allegations of child abuse, including child trafficking, and refers cases for prosecution. (3,34,35) Operates nationwide, covering the islands of Grande Comore, Anjouan, and Mohéli. Collaborates with <i>Services d'Ecoute</i> (Listening and Counseling Services). (7,36)
Ministry of Justice	Prosecutes criminal cases, including those related to child trafficking. (3,26)
National Commission for Human Rights and Freedoms	Receives complaints about the worst forms of child labor, investigates violations, and refers cases to the Ministry of Justice for prosecution. (11,37)

Labor Law Enforcement

In 2019, labor law enforcement agencies in Comoros took actions to combat child labor (Table 6). However, gaps exist within the operations of the Ministry of Labor that may hinder adequate labor law enforcement, including financial and human resource allocation.

Table 6. Labor Law Enforcement Efforts Related to Child Labor

Overview of Labor Law Enforcement	2018	2019
Labor Inspectorate Funding	Unknown	0 (8)
Number of Labor Inspectors	4 (36)	4 (8)
Inspectorate Authorized to Assess Penalties	Yes (36)	Yes (8)
Initial Training for New Labor Inspectors	Yes (36)	Yes (8)
Training on New Laws Related to Child Labor	N/A (36)	N/A (8)
Refresher Courses Provided	No (36)	No (8)
Number of Labor Inspections Conducted	25 (36)	12 (8)
Number Conducted at Worksite	25 (36)	12 (8)
Number of Child Labor Violations Found	0 (36)	0 (8)
Number of Child Labor Violations for Which Penalties Were Imposed	0 (36)	0 (8)
Number of Child Labor Penalties Imposed that Were Collected	0 (36)	N/A (8)
Routine Inspections Conducted	No (7,36)	Yes (8)
Routine Inspections Targeted	No (7,36)	Yes (8)
Unannounced Inspections Permitted	Yes (36)	Yes (8)
Unannounced Inspections Conducted	Yes (36)	Yes (8)
Complaint Mechanism Exists	Yes (36)	Yes (8)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Yes (36)	Yes (8)

The number of labor inspectors is likely insufficient for the size of Comoros's workforce, which includes approximately 278,500 workers. According to the ILO's technical advice of a ratio approaching 1 inspector for every 40,000 workers in less developed economies, Comoros would employ about 7 inspectors. (13,38-40) Reports indicate that there is a lack of training, equipment, transportation, and funding available to conduct child labor inspections and legal proceedings. (3,28,34,36,40,41) Inspectors have indicated that although there is a budget for fixed costs such as salaries, there is no operating budget for the inspectorate, and inspectors have to rely on their own funds for costs such as transportation. (8) The number of inspections was insufficient, and none of the inspections carried out during the reporting period was due to complaints related to child labor. (8)

Although the inspectorate is permitted to conduct unannounced inspections, in practice, inspectors usually only respond when the Ministry of Labor receives complaints. The 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. (8) 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 or used. (8)

Criminal Law Enforcement

In 2019, criminal law enforcement agencies in Comoros took actions to combat child labor (Table 7). However, gaps exist within the operations of the Morals and Minors Brigade that may hinder adequate criminal law enforcement, including allocating financial and human resources.

Table 7. Criminal Law Enforcement Efforts Related to Child Labor

Overview of Criminal Law Enforcement	2018	2019
Initial Training for New Criminal Investigators	No (36)	No (8)
Training on New Laws Related to the Worst Forms of Child Labor	N/A (36)	N/A (8)
Refresher Courses Provided	No (36)	No (8)
Number of Investigations	Unknown (36)	Unknown (8)
Number of Violations Found	Unknown (36)	Unknown (8)
Number of Prosecutions Initiated	Unknown (36)	Unknown (8)
Number of Convictions	Unknown (36)	Unknown (8)
Imposed Penalties for Violations Related to The Worst Forms of Child Labor	Unknown (36)	Unknown (8)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	Yes (7,36)	Yes (8)

Reports indicate that a lack of trained staff, equipment, transportation, and funding inhibit criminal law enforcement efforts on the worst forms of child labor. (2,4,35) Due to limited financial and human resources, police are, in some cases, unable to open an investigation unless the victim can contribute a portion of the expenses associated with the investigation, including fuel and telephone fees. Thus, investigations are sometimes reactive and may depend on the victim's wealth and knowledge of the criminal justice system, making cases related to violations of the worst forms of child labor unlikely to be investigated. (2,29)

The government did not provide information on its criminal law enforcement efforts for inclusion in this report.

IV. COORDINATION OF GOVERNMENT EFFORTS ON CHILD LABOR

The government has established mechanisms 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 implementation.

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

Coordinating Body	Role & Description
National Committee Against Child Labor	Coordinates government efforts on child labor. Chaired by MOL. (3,10,31) Research could not determine whether the National Committee Against Child Labor was active or received funding during the reporting period.
National Commission for Solidarity, Social Protection, and the Promotion of Gender*	Coordinates new government efforts to strengthen partnerships with state and non-state actors engaged in child protection issues. Established February 2019. (8)

* Mechanism to coordinate efforts to address child labor was created during the reporting period.

Comoros's inter-agency task force targeting trafficking in persons was no longer operational during the reporting period, and the country lacked a comprehensive anti-trafficking action plan. (12)

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 implementation.

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Table 9. Key Policies Related to Child Labor

Policy	Description
National Policy for the Protection of Children (2016–2021)	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, Solidarity, Social Cohesion, and Gender Promotion. (3,4,10,34) Research was unable to determine whether activities were undertaken to implement the National Policy for the Protection of Children during the reporting period.
Strategy for Accelerated Growth and Sustainable Development (2015–2021)	Aims to reduce poverty, promote sustainable development, and increase access to social services. Integrates strategies that target child labor. (42,43) Although implementation continued during the reporting period, with Comoros adopting new health and renewable energy sector projects in line with the policy framework, research could not identify actions taken that were relevant to addressing child labor. (44,45)

Although child labor is integrated into some government policies, Comoros has not adopted a new National Action Plan to address child labor and has not developed any new policies or programs to target or combat child labor since 2016. (8)

VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2019, 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 funding and adequacy of efforts to address the problem in all sectors.

Table 10. Key Social Programs to Address Child Labor

Program	Description
Decent Work Country Program (2015–2019)	Program that aimed 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. (9) Overseen by MOL and supported by ILO. (46) Research was unable to identify activities undertaken during the reporting period.
<i>Services d'Ecoute</i> (Listening and Counseling Services)†	Government program that provides protective services, secures new housing, and offers immediate assistance to vulnerable and abused children. Comprises four government-operated units on the islands of Anjouan, Grande Comore, and Mohéli. (2,27,36,47,48) Investigates allegations of violence against children, including the worst forms of child labor, and refers perpetrators to criminal authorities for prosecution. (8,29,36) The government opened a new center in 2019 in Foubouni on Grande Comore, and the service provided victim care to 134 minors, including some possible trafficking victims. (8,14)
UNICEF Country Program (2015–2021)	\$20,885 UNICEF-funded program that supports the government's efforts to strengthen children's rights to survival, development, education, protection, and social inclusion. (29,42) Funded a training in 2019 for 20 police and gendarmes and 3 children's judges to create a pool of certified trainers, as well as supported the development of internal procedures related to child protection. (8)

† Program is funded by the Government of Comoros.

Independent evaluation of the *Services d'Ecoute* found that it responded to the needs of child victims of violence and improved the professionalism of those responding to child victims. However, personnel in the *Services d'Ecoute* still lack relevant training in social service provision and in international standards on child protection, which has resulted in incomplete case work and a lack of follow up with, or evaluations of, child victims. (48, 49)

Although the government has programs that target child labor, their scope is insufficient to fully address the extent of the problem, particularly in agriculture and domestic work. (26,28,34,35) Comoros also lacks a specific program to assist children exploited by religious instructors.

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 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 – 2019
	Establish by law the right to free education through the basic level	2019
	Ensure that the law's minimum age provisions and protections apply to children in unpaid or non-contractual work.	2015 – 2019
	Align child trafficking laws with international standards by ensuring that force, fraud, or coercion are not required elements in child trafficking cases.	2019
	Raise the compulsory education age to age 15 to be equivalent to the minimum age for work.	2009 – 2019
Enforcement	Provide the labor inspectorate with an operating budget for resources, training, transportation, and equipment to provide adequate coverage of the workforce.	2009 – 2019
	Ensure that labor inspectors and criminal investigators receive regular and adequate refresher or initial training on child labor-related issues.	2019
	Increase the number of labor inspectors to meet the ILO's technical advice.	2018 – 2019
	Increase the number and frequency of labor inspections to enforce compliance with laws that address child labor.	2018 – 2019
	Ensure that the inspectorate uses its authority to conduct unannounced inspections rather than rely solely on complaints received to initiate inspections.	2017 – 2019
	Ensure that the labor inspectorate fulfills its mandate to provide data and statistics related to inspection efforts.	2019
	Establish and use a functioning reciprocal mechanism between labor enforcement authorities and social services.	2019
	Publish information on the number of criminal law investigations, violations found, penalties assessed, prosecutions initiated, and convictions related to cases of the worst forms of child labor.	2009 – 2019
	Increase criminal law enforcement personnel, resources, training, and transportation and equipment to enhance criminal law enforcement efforts related to the worst forms of child labor.	2009 – 2019
	Ensure that there are sufficient funds and resources to investigate crimes related to the worst forms of child labor so that victims are not expected to contribute financially.	2018 – 2019
Coordination	Ensure that the coordinating mechanisms are active and receive adequate funding to fulfill their missions.	2014 – 2019
	Develop a national action plan and corresponding coordinating body to address trafficking in persons in Comoros.	2019
Government Policies	Ensure that relevant policies are implemented, address child labor-related mandates, and report on yearly activities.	2019
	Adopt a new National Action Plan to Combat Child Labor and develop other relevant policies to combat the worst forms of child labor.	2016 – 2019
Social Programs	Enhance efforts to eliminate barriers to education, including for girls and poor children, by increasing school capacity, infrastructure, and teacher availability, and by addressing school violence.	2014 – 2019
	Collect and publish data on the prevalence of child labor and the types of work children perform in Comoros.	2019
	Ensure that social program personnel, such as those in the Services d'Ecoute, have adequate and relevant training to be able to appropriately respond to the needs of child victims.	2019
	Implement and expand existing programs to address the scope of the child labor problem, particularly in agriculture and domestic work.	2009 – 2019
	Implement programs to assist children exploited by religious instructors.	2016 – 2019

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