

In 2018, Comoros made a moderate advancement in efforts to eliminate the worst forms of child labor. The government carried out labor inspections for the second consecutive year, adding routine and unannounced inspections in 2018. Under the National Policy for the Protection of Children, the government also established two pilot listening sessions for child victims of violence and gathered data from the listening sessions to improve child protection. In addition, the National Commission of Human Rights and Freedoms and the General Delegation organized trainings for the police, gendarmerie, and army on children's rights. However, children in Comoros engage in the worst forms of child labor, including in agriculture. Children also perform dangerous tasks in domestic work. A gap between the minimum age for work and compulsory education age leaves children ages 13 to 15 vulnerable to child labor. In addition, social programs to combat child labor are 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 in agriculture. Children also perform dangerous tasks in domestic work. (I-5) 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, 2019. (6)

Source for all other data: International Labor Organization's analysis of statistics from Demographic and Health Survey, 2012. (7)

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† (8)
	Animal husbandry† (4)
	Fishing† (3,4,9)
Industry	Construction,† including in carpentry† (4)
	Extracting and selling marine sand† (8)
Services	Domestic work† (1,2,4,9-11)
	Street vending (3-5,12)
	Repairing cars† and bicycles,† including tire vulcanization† and battery charging† (4,8)
Categorical Worst Forms of Child Labor‡	Forced labor in domestic work, street vending, baking, fishing, and agriculture (5,8,13)

† 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.

# 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. (3-5,13,14) 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 in lieu of a school fee; girls usually perform domestic work, and boys perform agricultural labor. (4,5,14) 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. (5,14-16)

The Constitution guarantees free compulsory primary education until age 12 and states that no child younger than age 14 may be prevented from attending school, but this provision is not adequately enforced. In addition, although approximately equal numbers of boys and girls attended public primary schools, fewer girls completed primary education. (18,19) There are limited reports that, due to lack of school infrastructure and teacher availability, some primary and secondary schools had high student dropout rates, which disproportionately affected children from rural areas or poor and disadvantaged backgrounds. The Ministry of Education, in conjunction with UNICEF, is revising the school mapping system to ensure better access to education in rural areas. (19) However, the lack of school infrastructure and the limited availability of teachers may impede access to education, which may increase the vulnerability of children to the worst forms of child labor. (1,9,11,18,19)

## II. LEGAL FRAMEWORK FOR 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 (Table 4). However, gaps exist in Comoros' 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 (20)
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 (20,21)
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 (20-22)
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 (20,21)
Prohibition of Child Trafficking	Yes		Article 131 of the Labor Code; Article 13 of the Law to Combat Child Labor and Trafficking (20,21)

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

Standard	Meets International Standards	Age	Legislation
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 (20,21,23)
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 (20,21)
Minimum Age for Voluntary State Military Recruitment	Yes	18	Article 41 of Law No. 97-06/AF (24)
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 (21)
Compulsory Education Age	No	12	Article 2 of the Outline Act on the Education System (25)
Free Public Education	Yes		Article 1 of the Outline Act on the Education System; Preamble of the Constitution (25,26)

\* No conscription (27)

The government has drafted a Penal Code and a Code of Criminal Procedures that increase the penalties for human trafficking crimes, and has submitted a proposal to ratify the Palermo Protocol on Trafficking in Persons; however, neither of these legislative proposals was enacted during the reporting period. (15,27-30)

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 physical or moral development. (20) 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. (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 that require all children to be protected under the law establishing a minimum age for work. (3,31)

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 because they are not required to attend school but are not legally permitted to work. (32)

### 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.

**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. (4,5,18)
Police Morals and Minors Brigade	Investigates allegations of child abuse, including child trafficking, and refers cases for prosecution. (4,17,33) Operate nationwide, covering the islands of Grande Comore, Anjouan, and Mohéli. Collaborates with the <i>Services d'Ecoute</i> . (8,34,35)
Ministry of Justice (MOJ)	Prosecutes criminal cases, including those related to child trafficking. (4,27)
National Commission for Human Rights and Freedoms (CNDHL)	Receives complaints of the worst forms of child labor, investigates violations, and refers cases to the MOJ for prosecution. (12,34)

# Comoros

## MODERATE ADVANCEMENT

### Labor Law Enforcement

In 2018, 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	2017	2018
Labor Inspectorate Funding	Unknown	Unknown
Number of Labor Inspectors	4 (4,12)	4 (35)
Inspectorate Authorized to Assess Penalties	Yes (4,13)	Yes (35)
Initial Training for New Labor Inspectors	N/A	Yes (35)
Training on New Laws Related to Child Labor	N/A	N/A (35)
Refresher Courses Provided	Yes (4)	No (35)
Number of Labor Inspections Conducted	15 (4)	25 (35)
Number Conducted at Worksite	15 (4,12)	25 (35)
Number of Child Labor Violations Found	0 (4,12)	0 (35)
Number of Child Labor Violations for Which Penalties Were Imposed	N/A	0 (35)
Number of Child Labor Penalties Imposed that Were Collected	N/A	0 (35)
Routine Inspections Conducted	No (4,13)	No (8,35)
Routine Inspections Targeted	N/A	No (8,35)
Unannounced Inspections Permitted	Yes (4)	Yes (35)
Unannounced Inspections Conducted	No (4,13)	Yes (35)
Complaint Mechanism Exists	Yes (36)	Yes (35)
Reciprocal Referral Mechanism Exists Between Labor Authorities and Social Services	Unknown	Yes (35)

The number of labor inspectors is likely insufficient for the size of Comoros' 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. (13,37-39) Reports indicate that there is a lack of training, equipment, transportation, and funding available to conduct child labor inspections and legal proceedings. (4,17,28,35,39,40)

Reports indicate that this is the second consecutive year that there has been an increase in complaint-based labor inspections carried out; however, the number of inspections remains insufficient, and none of the inspections carried out were due to complaints related to child labor. (35)

### Criminal Law Enforcement

In 2018, 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	2017	2018
Initial Training for New Criminal Investigators	No (4)	No (35)
Training on New Laws Related to the Worst Forms of Child Labor	N/A (4)	N/A (35)
Refresher Courses Provided	No (4)	No (35)
Number of Investigations	Unknown (4)	Unknown (35)
Number of Violations Found	Unknown (4)	Unknown (35)
Number of Prosecutions Initiated	Unknown (4)	Unknown (35)
Number of Convictions	Unknown (4)	Unknown (35)
Imposed Penalties for Violations Related to The Worst Forms of Child Labor	Unknown	Unknown (35)
Reciprocal Referral Mechanism Exists Between Criminal Authorities and Social Services	No (4)	Yes (8,35)

In 2018, the National Commission of Human Rights and Freedoms and the General Delegation of Human Rights organized a training for the police, gendarmerie, and army on children's rights on the island of Anjouan. (35)

Reports indicate that a lack of trained staff, equipment, transportation, and funding inhibit criminal law enforcement efforts on the worst forms of child labor. (1,3-5,33) 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. (3,29)

The *Services d'Ecoute* offices, which are funded by the Government of Comoros, investigate allegations of violence against children, including the worst forms of child labor, and refer perpetrators to criminal authorities for prosecution. (29,35)

#### 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 adequate coordination of efforts to address child labor, including the efficacy in accomplishing mandates.

**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 the MOL. (4,11,31)
Monitoring Group for the Fight Against Trafficking in Persons	Coordinates actions against human trafficking and implements the Anti-Trafficking in Persons Action Plan. Headed by the Secretary General of the Government and includes representatives from the MOL, MOJ, CNDHL, police, international organizations, and NGOs. (3-5,33)

Research could not determine whether the National Committee against Child Labor and the Monitoring Group for the Fight against Trafficking in Persons were active or received funding during the reporting period.

#### 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 implementing a new national child labor action plan.

**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. (4,5,11,17) In 2018, established two pilot listening services to protect child victims of violence and created a database to harmonize the collection of information from the listening services. (8,35)
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. (41,42) In 2018, the Strategy for Accelerated Growth and Sustainable Development was extended by the government until 2021. (29)

In 2018, the government did not adopt the draft National Action Plan to Combat Child Labor. (43)

#### VI. SOCIAL PROGRAMS TO ADDRESS CHILD LABOR

In 2018, 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 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. (10) Overseen by the MOL and supported by the ILO. (44) In 2018, conducted a training to improve the capacity of tripartite constituents, including government officials and social partners, on ILO conventions. (45)
<i>Services d'Ecoute</i> †	Government program that provides listening and protection services to vulnerable and abused children. Comprises four government-operated units on the islands of Anjouan, Grande Comore, and Mohéli. (3,15,35,46,47) In 2018, added a second hotline and additional listening service units. (29,35)
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. (1,29,41) In 2018, continued to fund assistance for victims of the worst forms of child labor operated by the <i>Services d'Ecoute</i> . (4,28,35)
Early Childhood Development Program*	\$2,000,000 Dubai Cares-funded program that aims to improve school readiness and enhance lower primary learning outcomes and retention rates. The program is set to benefit at least 269,382 children and 1,725 teachers, school head teachers, and inspectors across all 394 primary schools in Comoros. (48,49)

\* Program was established during the reporting period.

† Program is funded by the Government of Comoros.

In 2018, the government continued to fund the *Services d'Ecoute* on all three islands, which conducted public awareness campaigns and worked closely with officials on Anjouan to ensure that families who send their children to stay with relatives comply with the requirement to have a judge approve the agreement. (15)

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. (17,27,28,33) 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	Ratify the Palermo Protocol on Trafficking in Persons.	2014 – 2018
	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 – 2018
	Ensure that the law's minimum age provisions and protections apply to children in unpaid or non-contractual work.	2015 – 2018
	Raise the compulsory education age to 15 to be equivalent to the minimum age for work.	2009 – 2018
Enforcement	Strengthen the labor inspectorate by conducting targeted inspections rather than performing inspections based solely on complaints received.	2017 – 2018
	Increase the number of labor inspectors to meet the ILO's technical advice.	2018
	Increase labor inspections and carry out labor inspections to enforce compliance with laws that address child labor.	2018
	Publish information on the labor inspectorate's funding and increase the resources, training, available transportation and equipment, and number of labor inspectors responsible for enforcing laws on child labor to provide adequate coverage of the workforce.	2009 – 2018
	Publish information on the number of criminal law investigations, violations found, prosecutions initiated, and convictions related to cases of the worst forms of child labor.	2009 – 2018
	Increase the resources, training, available transportation and equipment, and number of criminal law investigators responsible for enforcing laws on child labor.	2009 – 2018



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

Area	Suggested Action	Year(s) Suggested
Enforcement	Ensure that there are sufficient funds and no restrictions to investigate crimes related to the worst forms of child labor and allocate funds to conduct investigations.	2018
	Carry out criminal investigations to enforce compliance with the laws that address child labor.	2009 – 2018
Coordination	Ensure that the National Committee Against Child Labor and the Monitoring Group for the Fight Against Trafficking in Persons are active and receive adequate funding to fulfill their mission.	2014 – 2018
Government Policies	Adopt the draft National Action Plan to Combat Child Labor.	2016 – 2018
Social Programs	Enhance efforts to eliminate barriers and make education accessible for all children, including girls, by increasing school infrastructure and teacher availability.	2014 – 2018
	Implement and expand existing programs to address the scope of the child labor problem, particularly in agriculture and domestic work and under the tutelage of religious instructors.	2009 – 2018
	Implement programs to assist children exploited by religious instructors and return unaccompanied minors.	2016 – 2018

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