

# COMOROS

MINIMAL ADVANCEMENT – *Efforts Made but Regression in Practice that Delayed Advancement*

In 2023, Comoros made minimal advancement in efforts to eliminate the worst forms of child labor. The government adopted a new policy that promotes decent work and includes child labor prevalence studies and awareness efforts. However, despite this initiative to address child labor, Comoros is assessed as having made only minimal advancement because in 2023 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 a formal work agreement, 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, and the legal framework stipulates child trafficking crimes to require the use of force, fraud, or coercion, which does not conform with international standards.



## PREVALENCE AND SECTORAL DISTRIBUTION OF CHILD LABOR

### Statistics on Children's Work and Education

Children	Age	Percent of Population
Working		11.7% (Unavailable)
Boys	5 to 14	12.9%
Girls		10.5%
Urban		6.8%
Rural		13.8%
Hazardous Work by Children		24.1% (Unavailable)
Boys	15 to 17	26.0%
Girls		21.9%
Urban		22.8%
Rural		24.6%
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.

### **Legal Framework**

Ensure that the law's light work provisions set age 13 as the minimum age for work, 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.

Establish by law the right to free basic education.

Ensure that the law's minimum age for work provisions and protections apply to children in unpaid or non-contractual work.

Align child trafficking laws with international standards by ensuring that force, fraud, or coercion are not required elements in child trafficking cases.

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, equipment, and an adequate number of labor inspectors; 6 inspectors would ensure adequate coverage of the labor force of approximately 246,700 people.

Provide inspectors with appropriate training on new laws related to child labor and offer regular refresher trainings on the concepts of child labor law enforcement.

Ensure that the labor inspectorate uses its authority to conduct unannounced inspections in sectors in which child labor is likely present, such as the informal sector, rather than relying solely on incoming complaints to initiate inspections.

Ensure that the labor inspectorate fulfills its mandate to collect and publish data and statistics related to inspection efforts on an annual basis.

Ensure that a reciprocal survivor referral mechanism between enforcement authorities and social services is used to refer child labor victims to services on all of Comoros' islands, not solely on Grand Comore.

Publish information on the number of child labor violations found. Also publish information on the criminal law investigations, prosecutions initiated, convictions, and penalties assessed related to cases of the worst forms of child labor.

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.

### **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 and teacher availability, 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 *Services d'Ecoute*, have adequate and relevant training to be able to appropriately respond to the needs of child survivors, including those abused by religious instructors.

Implement and expand existing programs to address the scope of the child labor problem, particularly in agriculture, fishing, domestic work, and informal work.



## 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 often 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, 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.



## 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

Child Labor Laws and Regulations	Meets International Standards	Legislation
Minimum Age for Work, <b>15 Years</b>		Article 129 of the Labor Code
Minimum Age for Hazardous Work, <b>18 Years</b>		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
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, <b>18 Years</b>		Articles 41, 52, and 58 of Law No. 97-006/AF
Prohibition of Compulsory Recruitment of Children by (State) Military	<b>N/A*</b>	
Prohibition of Military Recruitment by Non-state Armed Groups		Article 6(a) of the Law to Combat Child Labor and Trafficking
Compulsory Education Age, <b>16 Years</b>		Article 2 of the Outline Act on the Education System; Article 4 on the Decree on Education Policy
Free Public Education		Article 1 of the Outline Act on the Education System; Preamble of the Constitution

\* Country has no conscription

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. 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. 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 conducted, or limit the number of hours for light work, as defined by international standards on child labor. 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.

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 the completion of compulsory education.

 **ENFORCEMENT OF LAWS ON CHILD LABOR**

In 2023, labor inspectors 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, it is unknown whether criminal law enforcement agencies in Comoros took actions to address child labor.

**Agencies Responsible for Child Labor Law Enforcement**

**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. Reports indicate that there is a lack of training, equipment, transportation, and funding available to conduct child labor inspections.

**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.

**Enforcement Mechanisms and Efforts**

Has a Labor Inspectorate	<b>Yes</b>	Has a Complaint Mechanism	<b>Yes</b>
Able to Assess Civil Penalties	<b>Yes</b>	Imposed Penalties for Child Labor Violations	<b>No</b>
Routinely Conducted Worksite Inspections	<b>No</b>	Conducted Criminal Investigations for Worst Forms of Child Labor Crimes	<b>Unknown</b>
Unannounced Inspections Permitted	<b>Yes</b>	Imposed Penalties for Worst Forms of Child Labor Crimes	<b>No</b>

In 2023, **2** labor inspectors conducted **0** labor inspections, due to a lack of resources to carry out inspections. It is **unknown** whether investigations into suspected cases of the worst forms of child labor were conducted, prosecutions were initiated, or perpetrators were convicted.



## COORDINATION, POLICIES, AND PROGRAMS

<p><b>Key Mechanism to Coordinate Government Efforts on Child Labor</b></p> <p>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.</p>	<p><b>National Committee Against Child Labor:</b> Coordinates government efforts on child labor. Chaired by MOL. Research was unable to determine whether the committee was active during the reporting period.</p>
<p><b>Key Policies Related to Child Labor</b></p> <p>Comoros established a policy related to child labor. However, the country lacks a national policy specifically dedicated to addressing child labor.</p> <p>‡ The government has other policies that may have addressed child labor issues.</p>	<p><b>National Policy for the Protection of Children (2016–2021):</b> Aimed to improve child protection. Although child labor is integrated into some government policies, research has not been able to identify if Comoros has adopted a new national action plan to address child labor since the previous plan expired in 2021.</p>
<p><b>Key Social Programs to Address Child Labor</b></p> <p>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.</p> <p>† Program is funded by the Government of Comoros.</p>	<p><b>Listening Services (Services d’Ecoute):</b>† UNICEF-funded, government-backed centers that provide protective services and offer immediate assistance to vulnerable and abused children. Investigates allegations of violence against children, including the worst forms of child labor, and refers perpetrators to criminal authorities for prosecution. An independent evaluation of Listening Services 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. Services were active during the reporting period.</p>

For information about USDOL’s projects to address child labor around the world, visit [dol.gov/ILABprojects](https://dol.gov/ILABprojects)  
 For references, please visit [dol.gov/ChildLaborReports](https://dol.gov/ChildLaborReports)