



Additional Background Information

ASSP Position Statement - Exploitative Child Labor

ASSP heard from several members about this issue and developed this position statement as a result.

ASSP Position on Exploitative Child Labor: ASSP opposes all forms of exploitative child labor practices. We call on governmental entities and nongovernmental organizations to combat exploitative child labor practices in the U.S. and around the world.

Please note that ASSP does not oppose reasonable approaches to young people working and realizing the benefits and responsibilities of working. We and our members fully understand the benefits of working as part of an individual's maturation process. Our position is not meant to take a stand against young people working appropriate hours or in settings such as the family farm.

Our concern specifically addresses exploitative child labor practices such as:

- Children working full time or an accumulation of weekly hours that interferes with a child's ability to attend school or educational opportunities.
- Exposure to long and/or hard physical labor and/or exposure to hazardous or toxic working environments.
- Very young children working in hazardous or toxic environments. For the purposes of this position statement, we identify very young children as being under the age of twelve years old.
- Work activities that do not allow a child to grow to be a healthy and productive person.
- All activities that demean and/or exploit children harmfully and inappropriately.

Specific Examples and Commentary

According to the International Labor Organization (ILO), "Hazardous work represents the largest category of the worst forms of child labor. These forms of child labor are considered





to be the most harmful and lead to adverse effects on the child’s safety, health (physical or mental) and moral development” (ILO, 2002). Paragraph 3 of the ILO’s Worst Forms of Child Labor Recommendations of 1999 (no. 190) identifies the types of work referred to under Article 3(d):

- work that exposes children to physical, psychological or sexual abuse.
- work underground, under water, at dangerous heights or in confined spaces.
- work with dangerous/hazardous machinery, equipment and tools, or that involves manual handling or transport of heavy loads.
- work in unhealthy/toxic environments that may, for example, expose children to hazardous substances, agents or processes, or to temperatures, noise levels, vibrations damaging their health, or other physical or psychosocial hazards.
- work under particularly difficult conditions such as working for long hours, during the night, traffic control or highway/road construction during any hours.
- work where the child is unreasonably “confined to the premises of the employer.” (O’Driscoll, 2017, p. 3)

O’Driscoll, D. (2017). Overview of child labour in the artisanal and small-scale mining sector in Asia and Africa. *K4D Helpdesk Report*. pp. 3-23.



Specific Examples

In the U.S. over the last several years, there has been an increased legislative focus to loosen child labor laws and restrictions in an effort to allegedly help industry combat supposed labor shortages. Wages for youth workers (between ages 14 and 17) are generally less than those workers who are age 18 and older based on the premise that they are “learning or are less productive” or that it allows young workers to learn skills needed in the future. The reality is that in many cases those arguments are hyperbole to allow industry to pay and treat young workers as lesser than their older working peers. There have been arguments to reduce restrictions on workers aged 16 and 17-year olds who perform hazardous construction jobs.

According to NIOSH/CDC (<https://www.cdc.gov/niosh/topics/youth/default.html>), young workers have high rates of job-related injury. These injuries are often the result of the many hazards present in the places where they typically work, such as sharp knives and slippery floors in restaurants. Limited or no prior work experience and a lack of safety training also contribute to high injury rates. Middle and high school workers may be at increased risk for injury since they may not have the strength or cognitive ability needed to perform certain job duties.

The ILO estimates that some 22,000 children are killed at work every year. However, because much of child labor is hidden, it is difficult to obtain accurate data on how children are being affected. For instance, the numbers of those injured or made ill because of their work are not known.

According to the ILO report, “Child Labor: Global Estimates 2020, Trends and the Road Forward (2021), there are 79 million children involved in hazardous work that directly endangers their health and safety. Hazardous work can cause death, serious illness or injury, permanent disability or psychological damage, as a direct consequence of poor safety and health standards, exploitation or abuse.

Some egregious examples that concern us include cobalt mining practices in the Democratic Republic of Congo” and other African counties. These working conditions are intolerable, and occupational safety and health professionals are encouraged to take steps to address them and prohibit said practices.





According to its 2021 report on child labor, ILO states that

The [2016 Global Estimates of Child Labour](#) indicate that one-fifth of all African children are involved in child labour, a proportion more than twice as high as in any other region. Nine per cent of African children are in hazardous work, again highest of all the world's regions.

Africa has the largest number of child labourers; 72.1 million African children are estimated to be in child labour and 31.5 million in hazardous work. Progress against child labour appears to have stalled in Africa. Child labour went up in Sub-Saharan Africa over the 2012 to 2016 period, in contrast to continued progress elsewhere in the world, and despite the targeted policies implemented by African governments to combat child labour. It is likely that the retrogression was driven in important part by broader economic and demographic forces acting against government efforts, although this matter would require further research. The Africa region has also been among those most affected by situations of state fragility and crisis, which in turn heightens the risk of child labour.

Worldwide, the agriculture sector accounts for by far the largest share of child labour. In Africa, agriculture accounts for 85 per cent of all child labour and for 61.4 million children in absolute terms. Child labour in agriculture relates primarily to subsistence and commercial farming and livestock herding; and it is often hazardous in its nature and in the circumstances, it is carried out. Of the remaining children in child labour in Africa, 8.1 million (11 per cent) are found in the services sector and 2.7 million (4 per cent) are found in industry. Most child labour is unpaid, and most children in child labour are not in an employment relationship with a third-party employer, but rather work on family farms and family enterprises.

In regard to the Congo, the U.S. Department of Labor, Bureau of International Affairs released this statement in 2022:

In 2022, the Republic of the Congo made minimal advancement in efforts to eliminate the worst forms of child labor. The government established a Child





Protection Action Plan, which includes measures for assisting child trafficking survivors. In addition, child labor data were published in June 2022, resulting from a nationwide study carried out by the Ministry of Social Affairs, Humanitarian Action and Solidarity in coordination with the United Nations Children's Fund. However, children in the Republic of the Congo are subjected to the worst forms of child labor, including in commercial sexual exploitation, sometimes as a result of human trafficking, and forced domestic work. Children also perform dangerous tasks such as working in mines and stone quarries. The government has yet to accede to the Palermo Protocol on Trafficking in Persons, and existing social programs are not sufficient to address the scope of child labor in all relevant sectors. In addition, the country lacks a national policy to address child labor.





Other Issues and Concerns

While child labor concerns exist in both undeveloped and even more developed nations, that is not always the case. For example, we have seen some WorkSafe Canada videos that pertain to younger workers who suffered severe injuries, with an emphasis on lack of training. Industrialized countries and older teens should be included in any policy.

ASSP Next Steps

- The Society will recruit authors to write articles and materials to educate its membership and the broader occupational safety and health community about this important issue.
- The Society will advocate for prohibition of exploitative child labor practices in the applicable global standards such as the ANSI/ASSP/ISO 45001 and ANSI/ASSP Z10 occupational health and safety management systems standards.
- Recommend that prohibiting exploitative child labor practices be specifically included in third-party certification systems for the ANSI/ASSP/ISO 45001 standard.
- Host and conduct a complimentary webinar on this issue for ASSP members and other interested professionals and stakeholders.
- Use ASSP's consultative status with the United Nations to raise or support enhancement of efforts to increase awareness of this issue
- Report on exploitative child labor practices and issues in its publications and materials
- Request that the ASSP membership take action to address exploitative child labor practices through supply chain requirements and ESG practices.
- When egregious examples are identified, provide updates in ASSP publications and technical materials
- Notify its membership of opportunities to speak out against these practices to public policy leaders and leaders in the non-governmental organization community.
- Work with other occupational safety and health organizations to address and prohibit exploitative child labor.





AMERICAN SOCIETY OF
SAFETY PROFESSIONALS

For More Information

Timothy R. Fisher, CSP, CHMM, CPEA, ARM, FASSP
Director, Standards Development and Technical Services
American Society of Safety Professionals
ASSP External Relations
520 N. Northwest Highway
Park Ridge, IL 60068
TFisher@ASSP.Org; 847/768-3411

Sue Trebswether
Director, Marketing/Communications
American Society of Safety Professionals
ASSP External Relations
520 N. Northwest Highway
Park Ridge, IL 60068
STrebswether@ASSP.Org
847/768-3433

