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REPORT

CHILD RIGHTS AND BUSINESS IN AFRICA:

ADVANCING CORPORATE ACCOUNTABILITY AND POLICY ACTION FOR SUSTAINABLE IMPACT

APRIL 30, 2025

EXECUTIVE SUMMARY

This report examines the impact of businesses in Africa on children's lives and explores potential solutions. It focuses on three countries: Zambia, Ethiopia, and Côte d'Ivoire. Each country is analysed through a distinct lens, providing national insights while highlighting broader regional trends. Collectively, the findings present a compelling case for reform across laws, policies, and business practices.

The study is based on the Children's Rights and Business Principles (CRBP), developed by Save the Children, UNICEF, and the UN Global Compact, which provides a global framework for how businesses can respect and support children's rights. Furthermore, General Comment No. 16 of the UN Committee on the Rights of the Child, which elaborates on states' obligations regarding the impact of the business sector on children's rights, served as a guiding framework, particularly for the Côte d'Ivoire component. In this context, the focus was on reviewing progress in the implementation of GC16 at the national level. For Zambia and Ethiopia, the CRBP served as the primary framework for assessing awareness, uptake, and gaps in national policies and private sector practices.

The report begins by outlining its purpose and methodology. Although each country report is presented independently, they collectively enhance a regional understanding of how children's rights are being upheld, or undermined, in business environments. The research was based on key informant interviews, document reviews, and insights obtained during a regional validation workshop.

In Zambia, the research highlighted notable legal advancements, including the enactment of the Children's Code; however, there is still limited awareness of the Child Rights and Business Principles (CRBP) across various business sectors. Child rights considerations in business are frequently viewed as components of corporate social responsibility rather than as fundamental obligations. Factors such as informal employment, weak enforcement mechanisms, and inadequate engagement with children in policy-making processes continue to jeopardise the welfare of children.

In Ethiopia, a comprehensive analysis of the garment sector revealed that stringent international brand requirements concerning child labour have led factories to exclude all workers under the age of 18. While this measure effectively prevents child labour, it inadvertently forces legally employable youth into informal and unsafe working conditions. Conversely, some businesses are showing innovation by implementing childcare services and improving workplace protections, thereby laying the groundwork for the scalability of best practices.

Côte d'Ivoire's approach focused on evaluating the implementation of Guiding Principles GC16 in national legislation and practice, particularly within the cocoa sector. The study revealed advancements in legal alignment and reporting efforts; however, it also identified that many businesses still lack awareness of their responsibilities under GC16, and enforcement mechanisms remain inadequate.

Common themes emerged across all three countries. Legal frameworks are often fragmented, and enforcement is limited. Corporate engagement with children's rights is largely voluntary, and the informal economy remains a blind spot for both regulation and protection. Business-related risks such as unsafe products, harmful advertising, and climate-related displacement are rarely addressed. Crucially, children and young people are seldom consulted in decisions that affect their wellbeing in business contexts. Regional bodies provide essential tools to address these gaps. The African Union Commission, through instruments such as the AfCFTA and the AU Draft Policy on Business and Human Rights, has the potential to integrate child protection into economic governance. Regional Economic Communities, including ECOWAS, SADC, EAC, COMESA, and IGAD, have made progress in harmonising child labour laws and promoting child-sensitive policies; however, there is a need for stronger enforcement and enhanced business accountability mechanisms. The ACERWC has emerged as a leader in this domain, issuing landmark resolutions and studies on children's rights within the business sector and advocating for due diligence and regional standards. Moreover, the African Commission on Human and Peoples' Rights and the African Court are beginning to establish legal precedents regarding corporate responsibility, thus creating new avenues for advocacy and litigation.

Finally, the report includes national and regional advocacy plans developed during the validation workshop. These plans outline key priorities, such as strengthening legal protections, increasing business awareness, improving enforcement, and utilising regional platforms to advocate for reform. Civil society organisations are positioned to play a central role in advancing these plans, bridging the gap between communities and regional mechanisms. This report provides policymakers, advocates, and business leaders with a clear picture of what's working, what's missing, and what actions are needed to better protect children. The message is simple: economic progress must not come at the expense of children. With coordinated action, strong leadership, and regional alignment, Africa can move toward an economic future that respects, protects, and empowers its youngest citizens.

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LIST OF ACRONYMS

Acronym	Full Meaning
ACERWC	African Committee of Experts on the Rights and Welfare of the Child
ACHPR	The African Commission on Human and Peoples' Rights
AfCFTA	African Continental Free Trade Area
AGOA	African Growth and Opportunity ACT
AU	African Union
AUC	African Union Commission
AZMEC	Association of Zambian Mineral Exploration Companies
COMESA	Common Market for Eastern and Southern Africa
CRBP	Children's Rights and Business Principles
CRC	Convention on the Rights of the Child
CRIAs	Child Rights Impact Assessments
CSOs	Civil Society Organisations
CSR	Corporate Social Responsibility
EAC	East African Community
ECOWAS	Economic Community of West African States
ETI	Ethical Trading Initiative
FDI	Foreign Direct Investment
GC16	General Comment No. 16
GTP-11	Growth and Transformation Plan II
ILO	International Labour Organisation
KIIs	Key Informant Interviews
MoLSA	Ministry of Labour and Social Affairs
NAP	National Action Plan
PACRA	Patents and Companies Registration Agency
RECs	Regional Economic Communities
SADC	Southern African Development Community
SIPE	Integrated System for Data Management on Child Protection
UNCRC	United Nations Committee on the Rights of the Child
UNGC	United Nations Global Compact
UNGPs	United Nations Guiding Principles on Business and Human Rights
UNICEF	United Nations International Children's Fund
UPR	Universal Periodic Review
ZACCI	Zambia Chamber of Commerce and Industry
ZAM	Zambia Association of Manufacturers
ZCM	Zambia Chamber of Mines
ZCEA	Zambia Civic Education Association
ZFE	Zambia Federation of Employers

INTRODUCTION:

BUSINESS AND CHILD RIGHTS IN AFRICA – A CRITICAL INTERSECTION

1. Background

Africa's economic transformation is accelerating, driven by rapid urbanisation, industrialisation, and increasing foreign direct investment. With children constituting nearly half of the continent's population, their well-being is crucial to Africa's future. However, as businesses assume a larger role in job creation, industrial development, and economic expansion, they also have a significant impact on children's rights, both positively and negatively.

Children across Africa are influenced by business operations in various ways: as young workers, dependents of employees, consumers, and community members. Sectors such as mining, agriculture, garment manufacturing, and fisheries pose serious risks, including exploitative child labour, hazardous working conditions, environmental degradation, and barriers to education and healthcare. Additionally, the digital economy, marketing, and emerging industries introduce new concerns such as child data privacy breaches, intrusive advertising, and digital addiction.

Despite international and regional commitments including the UN Guiding Principles on Business and Human Rights (UNGPs), ILO Conventions 138 and 182, the UN Convention on the Rights of the Child (CRC), and the African Charter on the Rights and Welfare of the Child (ACRWC) many African countries lack a clear National Action Plan (NAP) on Business and Human Rights. Without such a framework, corporate responsibility remains fragmented, enforcement mechanisms are weak, and businesses operate in a largely self-regulated landscape. In many instances, the absence of strong monitoring systems allows violations to persist, particularly within informal economies, which employ over 80% of Africa's workforce and often evade regulatory oversight.

Recognising the unique role that businesses must play in protecting children, the Children's Rights and Business Principles (CRBP) developed by United Nations Children's Fund (UNICEF), Save the Children, and the UN Global Compact serve as essential guidelines for corporations to uphold children's rights in business operations, supply chains, and community interactions. These principles emphasise that businesses have a responsibility to respect and support children's rights, mitigate harm, and implement proactive measures to ensure ethical corporate conduct. However, many companies still do not integrate these principles into their policies, supply chain management, or workplace regulations, resulting in systemic gaps in child protection.

Complementing the CRBP, General Comment No. 16 (GC16) of the UN Committee on the Rights of the Child provides authoritative guidance on state obligations regarding the impact of business activities on children's rights. GC16 emphasises the need for governments to regulate business conduct, hold companies accountable for violations, and ensure that corporate policies align with child protection frameworks. Despite its significance, many African countries have not fully incorporated GC16 into national legislation, resulting in weak regulatory frameworks, inadequate enforcement, and corporate impunity in cases of child rights abuses.

Save the Children has been at the forefront of efforts to address the intersection of business practices and child rights across Africa, commissioning multiple studies to explore sector-specific challenges and opportunities. These studies, which encompass a variety of sectors and regions, have

provided valuable insights into existing gaps and emerging best practices. However, the findings thus far are dispersed across different contexts, highlighting the need for more coordinated and strategic advocacy efforts that build on this expanding body of knowledge.

This report enhances these efforts by bringing together country-specific studies and regional insights into a single document, updated with additional stakeholder perspectives obtained through key informant interviews. It offers a current platform for advancing child rights and business advocacy at both national and regional levels.

Without sustained and coordinated action, Africa risks failing to meet key development goals, particularly those related to eradicating child labour, ensuring access to education, protecting children from exploitation, and promoting their overall well-being. Through clear, actionable recommendations, this study seeks to support governments, businesses, civil society organisations (CSOs), and regional bodies in fostering more child-centred and sustainable business practices.

2. Scope of the Study

This study investigates how business operations affect child rights across Africa, emphasising sector-specific risks, regulatory gaps, and corporate responsibilities. It focuses particularly on sectors where children are most vulnerable, including agriculture, mining, and manufacturing. Through an extensive desk-based review and key informant interviews (KIIs) with policymakers, civil society actors, business leaders, and regional organisations, this study evaluates systemic weaknesses, emerging risks, and opportunities for intervention.

Recognising that informal employment represents a significant portion of Africa's economy, the study also examines how unregulated business activities contribute to child vulnerability, especially in agriculture, the garment industry, and mining. Many of these sectors operate outside legal protections, complicating efforts to track child labour, enforce corporate accountability, and ensure workplace safety. Moreover, climate change is increasingly driving child labour migration and economic exploitation, particularly in drought-affected agricultural communities, making environmental accountability a crucial element of child-friendly business policies.

The study further investigates the role of the African Union (AU) and Regional Economic Communities (RECs) in shaping policy and enforcement mechanisms. While the AU has established frameworks such as Agenda 2063 and the African Continental Free Trade Area (AfCFTA), there is an urgent need to ensure these policies align with child rights protections and principles of corporate responsibility. RECs, including ECOWAS, SADC, COMESA, and the East African Community (EAC), play a vital role in harmonising child protection laws across borders, ensuring that businesses adhere to minimum standards regardless of their operational location. Additionally, the study examines the contribution of regional CSOs in advocating for child rights and business accountability on AU and RECs platforms, thereby enhancing policy coherence and amplifying grassroots voices in regional governance.

3. Aims and Objectives

This study seeks to present findings on child rights and business from three African countries: Zambia, Ethiopia, and Côte d'Ivoire. Each country is examined through distinct lenses, reflecting its national contexts and priorities. The country reports provide independent analyses: Zambia focuses on the broader landscape of child rights and business practices; Ethiopia explores labour practices

within the garment industry; and Côte d'Ivoire assesses the implementation of General Comment No. 16 regarding state obligations related to the impact of business activities on children's rights.

Each report is tailored to the specific context of its respective country and serves as an independent resource for Save the Children country offices to support their national advocacy and programming initiatives. Collectively, these reports provide insights into emerging trends, persistent gaps, and opportunities to advance child rights and business principles across the three countries, while offering perspectives on how national actors can engage with broader regional mechanisms.

At the regional level, the study provides indicative insights into the intersection of child rights and business issues within the frameworks of the African Union (AU) and the efforts of Regional Economic Communities (RECs). It highlights opportunities for national stakeholders to enhance corporate accountability for children's rights through regional engagement.

A key objective of the study is to develop actionable recommendations tailored for businesses, civil society organisations (CSOs), and governance bodies, equipping them with strategies to integrate child rights into corporate policies, supply chains, and regulatory frameworks. To ensure that these recommendations are well-informed and reflective of stakeholder priorities, the study validates its findings through multi-stakeholder engagement, bringing together policymakers, corporate leaders, advocacy groups, and regional bodies.

Additionally, the country reports equip Save the Children country offices with strategic tools to evaluate their respective child rights and business landscapes, highlighting progress made, ongoing challenges, and priorities for advocacy and programming that align with national and international best practices.

4. Methodology

This study employs a comprehensive, multi-method research approach that integrates desk-based analysis, key informant interviews (KIIs), and stakeholder consultations to deliver a well-rounded assessment of the impacts of business on child rights.

A thorough review of existing literature, legal frameworks, and corporate policies lays the groundwork for understanding the regulatory landscape and sector-specific challenges. To enhance this analysis, insights were gathered through KIIs with representatives from civil society, the private sector, government bodies, and regional organisations. These discussions offered updated perspectives on policy trends, enforcement challenges, and gaps in business accountability.

Furthermore, findings from the desk review and KIIs were validated through a stakeholder validation workshop, which convened policymakers, business leaders, CSOs, and regional experts. This platform ensured that the developed recommendations were practical, consensus-driven, and aligned with the priorities of those responsible for implementation. By incorporating multiple perspectives, the study guarantees that its conclusions are both evidence-based and action-oriented.

5. Report Structure

This report presents findings on child rights and business from Zambia, Ethiopia, and Côte d'Ivoire, supplemented by indicative regional insights. It is organised into four main sections.

The first section provides detailed country-specific analyses, reflecting the distinct contexts and focus areas in each country. Each national section outlines progress made, ongoing challenges, and targeted recommendations for key stakeholders, including governments, businesses, and civil society organisations.

The second section discusses cross-cutting themes that emerge from the country analysis, identifying areas for collaboration, policy development, and programme strengthening across sectors.

The third section offers a regional perspective, examining how child rights and business issues intersect with African Union (AU) frameworks and the activities of Regional Economic Communities (RECs). This section highlights opportunities for strengthening corporate accountability through regional mechanisms and provides recommendations for advancing child rights within broader policy processes. The final section of the report consolidates the key recommendations and introduces preliminary advocacy action plans developed during a multi-stakeholder validation workshop. These advocacy plans serve as initial frameworks for national-level engagement on child rights and business, offering strategic pathways for future advocacy initiatives by country offices, CSOs, regional bodies, and other key actors.

ZAMBIA

STRENGTHENING REGULATORY FRAMEWORKS FOR CHILDREN'S RIGHTS IN BUSINESS PRACTICES

1. Introduction & Background

The Zambia Pre-Consultation on Children's Rights and Business Principles (CRBP), conducted in December 2010, represented a significant initiative focused on integrating children's rights into corporate governance. Organised in collaboration with Save the Children, UNICEF, and the UN Global Compact Zambia Network, the consultation sought to engage key stakeholders, including businesses, academia, and civil society, in discussions regarding the private sector's role in promoting and protecting children's rights.

2. Key Findings from the Consultation

a. Business Perspectives on Child Rights

During the consultation, businesses acknowledged the crucial role that children play in ensuring economic sustainability, both as future employees and as influential market participants. Participants discussed how children's evolving interests drive innovation and how they indirectly contribute to the workforce by motivating employees who are also caregivers.

A Zambian proverb, ***"The pride of the forest lies in its young trees," was cited to emphasise that investing in children secures the country's future***. However, concerns were raised that businesses perceived their influence on child rights as limited to employed children, overlooking broader societal impacts.

Participants highlighted several challenges related to child labour, particularly in hotels, domestic work, and agriculture. They noted that children employed in these sectors often face exploitation, unfair wages, and poor working conditions. There was a consensus that paying fair wages to adult employees could help reduce reliance on child labour. Environmental concerns were also addressed, with participants agreeing that children are disproportionately affected by environmental degradation, including corporate pollution and CO2 emissions.

3. Key Issues Identified for CRBP Principles

a. Workplace Policies and Economic Considerations

The consultation revealed that low wages in Zambia directly impact child rights, hindering access to health, education, and nutrition. Participants highlighted that the HIV/AIDS pandemic has resulted in an increase in families caring for non-biological children, which further strains household resources. Businesses were encouraged to offer living wages that reflect the costs of caregiving responsibilities, not just for direct dependents but also for hosted children.

To address these challenges, companies were urged to:

- Implement child-friendly workplace policies, including healthcare, maternity benefits, and educational support for employees' children.
- Create family-friendly work environments, such as on-site childcare facilities.
- Establish non-discriminatory workplace policies, although specific child protection policies were not discussed in detail.

b. Government Engagement and Business Regulation

The 2010 consultative meeting raised concerns that enforcement efforts regarding business activities and child rights were primarily focused on child labour, rather than adopting a broader corporate responsibility framework. Participants acknowledged that while Zambia had ratified international conventions on child labour, including ILO Conventions 138 and 182, enforcement mechanisms remained inconsistent and under-resourced. Stakeholders expressed concerns that government agencies lacked the capacity to effectively regulate businesses, with labour inspection systems suffering from inadequate funding, understaffing, and insufficient training. This placed the burden of enforcement largely on businesses themselves, many of which were expected to self-regulate in the absence of rigorous government oversight. Participants noted that, in practice, businesses complied with minimum labour requirements, but without proactive engagement from regulatory agencies, there was little incentive to incorporate comprehensive child rights protections into corporate policies. A key issue raised was the government's inability to consistently enforce existing labour laws, resulting in businesses operating within a fragmented regulatory landscape. Stakeholders pointed out that while Zambia had sufficient legal provisions prohibiting child labour, the lack of effective monitoring mechanisms and enforcement measures meant that child labour persisted in informal employment and subcontracting arrangements. The consultation also highlighted that businesses needed to advocate for stronger regulatory policies rather than relying on government intervention to address labour rights violations. To tackle these challenges, participants recommended that Zambia establish a National Child Rights and Business (CRBP) Strategy to align government agencies, businesses, and civil society stakeholders in a coordinated approach to corporate responsibility. This would involve strengthening labour inspection systems, increasing government funding for enforcement activities, and implementing tax incentives for businesses that incorporate child rights protections into their policies and practices. Furthermore, participants emphasised the need for public-private partnerships to enhance corporate-led child welfare programmes, ensuring that business compliance with child protection standards is actively monitored and enforced.

c. Supply Chain Accountability

Participants acknowledged the challenges associated with monitoring child labour in supply chains, particularly within the agricultural sector and informal employment. The discussion highlighted that subcontracting arrangements frequently obscure accountability, thereby complicating companies' efforts to ensure ethical labour practices beyond their direct operations.

To mitigate these risks, stakeholders proposed the incorporation of child rights protection clauses into supplier contracts and the establishment of corporate monitoring mechanisms to ensure compliance. However, participants expressed concerns regarding the feasibility of fully controlling supply chains within informal economies.

d. Marketing, Advertising and Child Protection

The need for enhanced regulations on marketing and advertising aimed at children emerged as a significant concern. Stakeholders underscored the importance of parental guidance concerning internet use and the implementation of content filters to safeguard children from harmful online material. Additionally, businesses were encouraged to adopt responsible advertising policies, ensuring that children are not exploited in marketing strategies or subjected to inappropriate commercial messaging.

4. Challenges in Implementing Child Rights in Business

During the consultation, businesses identified several key obstacles to integrating child rights into their corporate operations. Many companies acknowledged a lack of awareness and training regarding child rights issues, which hindered their ability to implement best practices. Additionally, the complexity of supply chain oversight posed a significant challenge, as businesses struggled to prevent child labour in the subcontracting and informal sectors.

Participants also pointed out the limited business-to-business communication on child rights compliance, which made knowledge sharing and capacity building difficult. To address these gaps, stakeholders recommended

- Training programmes for employees and suppliers on child rights and corporate responsibilities.
- Incorporating child rights into corporate codes of conduct and supplier agreements.
- Creating more forums for businesses to share lessons and best practices on integrating child rights.

As a result of the consultation, UNICEF, Save the Children, and the UN Global Compact committed to finalising the CRBP with insights from Zambian participants. Additional key commitments included:

- Establishing a Child Rights Business Group in Zambia to foster corporate engagement on child welfare.
- Encouraging businesses to integrate CRBP principles into their corporate policies and operations.
- Promoting greater collaboration with the UN Global Compact network to enhance business awareness and implementation of child rights best practices.

These insights established a foundation for ongoing business engagement concerning child rights in Zambia, culminating in a commitment to formalise the CRBP within corporate policies. Moving forward, sustained stakeholder engagement and monitoring was essential to assess the extent to which these recommendations have been implemented and their overall impact on corporate governance and child protection efforts in Zambia.

5. Progress and gaps on CRBP Implementation in Zambia Since 2010

Since the 2010 Pre-Consultation Meeting on Children's Rights and Business Principles (CRBP), Zambia has made significant progress in incorporating child rights into corporate policies and governance structures. Although challenges remain, notable achievements have been realised through legislative reforms, increased engagement from civil society organisations (CSOs), and voluntary commitments by businesses.

This section examines the advancements and gaps made since 2010, focusing on advocacy efforts, policy integration, the adoption of child protection measures by businesses, and Zambia's involvement in international reporting mechanisms. Insights from Key Informant Interviews (KIIs) provide a comprehensive understanding of the current status of CRBP implementation, highlighting areas where substantial improvements have been achieved and identifying ongoing gaps that necessitate further intervention.

a. Progress and Gaps in Legal and Policy Frameworks

Since 2010, Zambia has progressively integrated child rights into its national policy and legal frameworks (see table 1 below). However, a dedicated framework addressing corporate responsibility for child rights in business practices remains absent. While some legislative and policy reforms have enhanced child protection, they do not explicitly incorporate the CRBP into business and corporate governance structures. As a result, businesses operate without clear legal obligations on how to integrate child rights into their policies, supply chains, or corporate social responsibility initiatives.

A major concern is the prevalence of child labour in Zambia's informal sector, which continues to be largely unregulated by law or policy. According to the 2020 Zambia Child Labour Report, 2,796,813 children aged 5-17 years are engaged in work, with 64.7% in rural areas and 35.3% in urban areas. The report further indicates that 430,075 children are involved in child labour, with the majority (58.1%) located in rural areas. Alarmingly, 29,057 children are subjected to hazardous child labour, exposing them to dangerous working conditions. The agriculture, forestry, and fishing sector accounts for the highest incidence of child labour (58.3%), highlighting that most children in labour-intensive industries lack legal protection (Page 36). The absence of formal oversight in the informal sector leaves children vulnerable to exploitation in unsafe and unregulated environments.

Despite advancements in bolstering child protection laws, significant gaps persist regarding business accountability for child rights. The Children's Code Act (2022) reinforces child protection and participation but fails to define corporate responsibilities towards children. Additionally, while the Employment Code Act (2019) prohibits child labour and establishes 15 years as the minimum employment age, enforcement issues and unclear definitions of light work for children aged 13-15 create loopholes that may facilitate exploitation. Furthermore, businesses are not required to conduct Child Rights Impact Assessments (CRIAs), allowing their operations to potentially negatively affect children's safety, health, and well-being without accountability. The National Planning and Budgeting Act (2020) presents an opportunity for child-sensitive planning at the governmental level; however, it does not assign these responsibilities to businesses.

Zambia has made significant progress in strengthening the legal framework governing marketing and advertising through the enactment of several recent laws. The Zambia Institute of Marketing Act, 2022 and its 2023 Amendment have introduced ethical standards and professional regulation for marketers, establishing a foundation that could support child-sensitive marketing practices. Similarly, the Competition and Consumer Protection (Amendment) Act No. 21 of 2023 reinforces safeguards against misleading advertising, creating a broader consumer protection framework that could be expanded to better address child-specific vulnerabilities.

The Electronic Communications and Transactions Act, No. 4 of 2021, regulates unsolicited digital marketing, providing a potential tool for mitigating children's exposure to inappropriate content online. Notably, Section 71(1) of the Act empowers authorities to issue directives targeting special circumstances for children and vulnerable consumers. However, there is limited clarity on how child-specific protections in digital marketing and data privacy are implemented in practice.

While these legislative developments create an enabling environment, there is currently no evidence of explicit standards or provisions regulating marketing practices that specifically

target or impact children. This presents a clear opportunity for Zambia to further align its legal framework with CRBP by integrating child-focused marketing standards, strengthening safeguards against harmful advertising, and enhancing protections in the digital space. Meanwhile, Zambia's National Action Plan (NAP) on Business and Human Rights is still unfinished, with no clear evidence of meaningful involvement from child rights organisations in its development. The absence of child welfare advocates in the process risks overlooking critical child-specific protections, which further undermines corporate accountability. The failure to incorporate child rights considerations into corporate regulations carries serious implications. Children remain exposed to exploitative labour, hazardous working conditions, and harmful corporate practices, including unsafe advertising and environmental pollution. The lack of strong enforcement mechanisms allows businesses to operate without evaluating their impact on children, perpetuating harmful labour practices and failing to protect children from corporate-related risks.

To address these gaps, Zambia must strengthen corporate regulations by mandating child rights due diligence, enhancing enforcement of child labour laws, integrating child rights into the NAP on Business and Human Rights, and requiring Child Rights Impact Assessments (CRIAs) for businesses. Without these reforms, children will continue to be marginalised in discussions about business and human rights, and corporate practices may remain misaligned with child welfare protections.

Table 1: Child Rights and Business gaps in select legal and policy instruments

Law/Policy	Progress	Gaps	Child Rights and Business Implications
Employment Code Act, 2019	Section 81(1) sets the minimum age for employment at 15 years, aligning with international standards to prevent child labour. Section 83: Prohibits employment of young persons (15-18 years) in hazardous work that may harm their safety, health, or morals. Section 41: Grants female employees 14 weeks of maternity leave with full pay, supporting child welfare. Section 40: Provides 7 days of paid family responsibility leave for employees to care for sick children or dependents.	No explicit mandate for businesses to adopt child-friendly practices beyond child labour prohibition. Lacks a clear definition of 'light work' (allowed for children 13-15), leading to potential exploitation.	Businesses must comply with minimum age requirements and avoid employing children in hazardous conditions. Companies should develop child protection policies, even though not legally required, to safeguard child rights in operations and supply chains. Providing maternity and family leave contributes to a supportive work environment that benefits children's welfare.
National Planning and Budgeting Act, 2020	Establishes a legal framework for integrating child rights considerations into national development plans (Section 3 - Principles of Planning and Budgeting). Promotes participatory planning, allowing for child-focused policies in budgeting (Section 37 - Public Consultation on Green Paper). Strengthens monitoring and evaluation mechanisms that can track child-focused outcomes (Section 28 - Annual Monitoring and Evaluation of the National Development Plan and Budget).	Does not explicitly mandate businesses to consider child rights in their corporate strategies; it lacks specific provisions requiring child-sensitive budget allocations in business sectors.	Provides an opportunity to advocate for child-centred business policies within national planning; businesses are not legally required to integrate child rights into corporate social responsibility or operational frameworks.
Children's Code Act, 2022	Integrates child protection and participation as core legal principles; strengthens child protection mechanisms. Section 13(1) and (2) - This section prohibits the economic exploitation of children and work that is hazardous to their health, education, or development. It aligns the minimum age for employment (15 years) and work protections for young persons with the Employment Code Act, 2019. Sections 17 and 19 prohibit the sale, trafficking, abduction, sexual exploitation, involvement in prostitution and pornography, as well as the use of children in drug production, trafficking, and distribution. Furthermore, section 20 addresses the consumption of harmful substances, including alcohol, tobacco, and hallucinogens.	Lacks specific provisions related to CRBP; does not delineate corporate obligations for respecting and protecting children's rights; primarily concentrates on juvenile justice, child protection, and child participation, without extending responsibilities to businesses. While it prohibits child labour and exploitation, it addresses violations through criminalisation rather than implementing proactive business prevention measures. There are no requirements for companies to conduct child rights due diligence, verify supply chains, implement safeguarding measures, or mitigate sector-specific risks, resulting in a significant gap in corporate accountability frameworks.	No legal mandate for businesses to conduct child rights due diligence, prevent adverse impacts on children, adopt child-friendly workplace policies, or address environmental impacts on children.

Social Workers' Association of Zambia Act, 2022[1]	Regulates social workers' professional conduct, establishes ethical standards, and provides a framework for advocacy and policy influence in child rights.	Does not impose direct corporate accountability for child rights; primarily focuses on social workers rather than businesses; lacks provisions requiring businesses to integrate child rights considerations into their operations.	Provides an advocacy framework for social workers to influence business practices; does not mandate businesses to conduct child rights due diligence, adopt child-friendly policies, or mitigate corporate impacts on children.
Zambia Institute of Marketing Act, 2022 & Amendment Act, Act No. 15 of 2023	Establishes ethical standards for marketing and regulates professional marketing conduct, creating an environment that could support ethical child-focused marketing practices.	There is no evidence of specific standards or child-focused provisions regulating the marketing of harmful products or addressing misleading advertising targeted at children.	There is an opportunity to integrate child-focused ethical marketing standards and strengthen safeguards to protect children from harmful advertising content.
Competition and Consumer Protection (Amendment) No. 21 of 2023	Protects consumers from false or misleading advertising, providing a foundation that can extend to protect child consumers.		
The Electronic Communications and Transactions Act, No. 4 of 2021	Regulates unsolicited electronic marketing communications, which could mitigate children's exposure to inappropriate marketing if expanded.	There is limited clarity on the implementation of child-specific protections in digital marketing and data privacy; however, Section 71(1) of the Act provides that the Authority may issue directives to address special circumstances concerning children and vulnerable consumers.	Opportunity to establish standards for child-friendly online marketing and improve data protection for minors.
Draft National Action Plan (NAP) on Business and Human Rights	Recognises the need for business accountability in human rights. Identifies gaps in corporate responsibility towards communities and vulnerable groups, including children. Acknowledges the importance of stakeholder engagement in policy development.	No explicit mandate for child rights inclusion in business policies. No enforcement mechanisms to hold businesses accountable for child labour and exploitative practices. Lack of child-sensitive corporate due diligence requirements. Failure to incorporate child rights impact assessments (CRIAs) into business regulations.	Children remain vulnerable to corporate exploitation, hazardous working conditions, and unfair labour practices. Absence of child rights considerations in the NAP risks excluding children from protections in business operations. Lack of corporate accountability means businesses may continue operations harmful to children's well-being, such as environmental degradation and harmful marketing practices. The exclusion of child rights organisations in NAP discussions weakens advocacy for stronger child protections in business settings.

[1] Social Workers' Association of Zambia Act, 2022. E:\ACTS FOR 2022\ACT No. 4 OF 2

b. Increasing Awareness and Engagement of Civil Society and Businesses on CRBP in Zambia: Progress, Challenges, and Gaps

The integration of CRBP in Zambia has been predominantly led by civil society organisations (CSOs), with Save the Children Zambia playing a pivotal role in raising awareness, enhancing capacity, and advocating for corporate accountability regarding child rights. However, despite these initiatives, CRBP remains a relatively new and poorly understood concept, particularly within government institutions and the private sector. Several factors have hindered the institutionalisation of CRBP within business and governance structures, including the slow pace of policy adoption, limited legal enforcement mechanisms, weak multi-stakeholder collaboration, and insufficient funding.

Findings from key informant interviews (KII) with CSOs, including the Save the Children Zambia Country Office, indicate significant achievements, ongoing challenges, and critical gaps that must be addressed to effectively institutionalise CRBP within both corporate and public sector frameworks.

Save the Children Zambia has been at the forefront of initiatives designed to train and equip CSOs to advocate for and integrate CRBP in Zambia.

Through a Swedish-funded initiative, the organisation collaborated with the Zambia Civic Education Association (ZCEA) to enhance the capacity of twelve CSOs under its Driving Sustainable Change for Children's Rights Programme.

These organisations received training in child rights due diligence, corporate engagement, and policy advocacy, thereby empowering them to incorporate CRBP as a cross-cutting issue within their programming.

Some of the trained CSOs went beyond advocacy and engaged in direct action to protect children from hazardous business practices. For example, Care for Nature in Northern Zambia successfully negotiated Memoranda of Understanding (MoUs) with traditional leaders and businesses to combat child labour in small-scale mining activities. This grassroots approach showcased the effectiveness of local advocacy, as CSOs, collaborating closely with community leaders, were able to secure concrete commitments from businesses to prevent children from entering exploitative labour.

i. National-Level Policy Advocacy and Government Engagement

In addition to enhancing organisational capacity, Save the Children Zambia also supported national-level advocacy efforts. Its engagement with district child labour committees contributed to raising awareness of CRBP within government agencies. This advocacy was instrumental in the Ministry of Community Development and Social Services launching a national television awareness campaign on child labour, featuring children from child rights clubs as advocates. However, despite these achievements, many government officials and district labour committees remained largely unaware of CRBP beyond issues related to child labour. There was a lack of effort to integrate CRBP into national regulatory frameworks, resulting in businesses lacking accountability mechanisms to monitor compliance with child rights.

Additionally, Save the Children Zambia and its CSO partners ensured that concerns related to CRBP were incorporated into Zambia's human rights reports submitted to international bodies, including the Universal Periodic Review (UPR) and the UN Convention on the Rights of the Child (CRC).

While CSOs endeavoured to align corporate responsibility with national policy frameworks, these efforts were hindered by a lack of robust legal backing. Despite Save the Children Zambia's success in engaging businesses to voluntarily adopt child-friendly business policies, there was no formal government directive requiring businesses to comply with CRBP.

Attempts to introduce CRBP compliance requirements in business registration through the Patents and Companies Registration Agency (PACRA) have failed due to insufficient engagement with the Ministry of Justice, highlighting a limited government commitment to institutionalising CRBP.

A significant barrier to tracking CRBP progress has been the lack of reliable data on child labour and business-related rights violations. CSOs lack access to comprehensive data on the business sector, which hampers their ability to assess the extent to which companies uphold child rights. In the absence of baseline data and monitoring mechanisms, measuring the impact of CRBP interventions and developing evidence-based advocacy strategies remains challenging.

ii. Engagement of Children in CRBP Advocacy

One of the key successes of civil society organisations (CSOs) in Zambia has been the involvement of children in advocacy on the Child Rights and Business Principles (CRBP). Save the Children Zambia, in partnership with the Zambia Civic Education Association and the National Child Rights Forum, has actively facilitated child participation in advocacy campaigns, alternative reporting processes, and media engagements. Children have assumed a direct role in these efforts, particularly through media outreach, where they have participated in radio.
and television discussions on child labour, corporate responsibility, and government accountability.

Additionally, children were actively engaged in developing child-led submissions for international treaty bodies, including the CRC reporting process and UPR reviews. However, despite these efforts, child participation in CRBP discussions remains limited, primarily due to low awareness and the highly technical nature of the subject matter. In contrast to broader child rights issues such as education and health, CRBP has been largely overlooked in child and youth advocacy spaces, hindering children's ability to fully participate and hold businesses accountable.

iii. Business Engagement on CRBP in Zambia

1. Corporate Buy-In and Sector Engagement

In an effort to engage the private sector, Save the Children Zambia initially focused on collaborating with individual businesses. However, as the project evolved, the emphasis shifted towards targeting business umbrella

organisations, such as the Zambia Chamber of Commerce and Industry and the Zambia Institute of Marketing. This strategic change facilitated a broader adoption of child-friendly business policies and enhanced business engagement in CRBP.

Through this initiative, over 94 businesses were supported in developing child protection policies. Some of these businesses actively sought additional guidance on how to integrate CRBP into their operations and support child-focused community initiatives. This demonstrated that, with effective engagement, businesses could be encouraged to adopt policies aligned with CRBP.

However, despite these successes, businesses generally resisted fully integrating CRBP into their operations. Many viewed CRBP as a Western-driven agenda that interfered with their business interests, resulting in low voluntary adoption of the principles. Additionally, some businesses signed child protection policies merely as a tick-box exercise, without actually implementing or monitoring compliance.

Since CRBP compliance is voluntary, enforcement remains challenging without government mandates or legal obligations. Furthermore, the absence of structured training programmes for businesses meant that even those engaged had limited awareness of how to operationalise CRBP.

According to KII, CSOs encountered challenges in framing CRBP as an economic advantage, which hindered their ability to illustrate the business case for ethical practices. Many businesses perceived CRBP as a cost burden rather than a value-driven strategy, primarily because CSOs did not effectively communicate its financial and reputational benefits. The private sector often prioritises profitability and operational efficiency; in the absence of a clear economic incentive, CRBP was viewed as an additional compliance requirement rather than a strategic advantage. CSOs needed to emphasise how ethical business practices enhance brand reputation, consumer trust, employee retention, and long-term sustainability. The absence of sector-specific case studies or data demonstrating the financial benefits of child-friendly business policies further weakened the business case for adopting CRBP. Without clear return-on-investment narratives, many companies remained hesitant to fully integrate child rights considerations into their business models.

iv. Gaps and Challenges in CRBP Implementation

1. Weak Legal and Policy Frameworks

It is crucial to emphasise that CRBP remains voluntary, as it is not yet integrated into national laws. Without legal mandates, businesses are not obligated to adopt child-friendly policies, leaving corporate compliance entirely at their discretion.

There is an opportunity to strengthen government enforcement mechanisms and enhance the capacity of regulatory agencies to effectively oversee corporate compliance with child rights and business policies. By equipping regulators with comprehensive knowledge of CRBP, they will be better positioned to support businesses in aligning their operations with child-friendly standards. Improving legal backing and regulatory oversight will not only promote business accountability but also ensure that child protection standards are effectively integrated across industries. Strengthening these frameworks will be instrumental in advancing the institutionalisation of CRBP within Zambia's corporate landscape, fostering a more sustainable and responsible business environment that prioritises children's rights.

2. Limited Stakeholder Capacity on CRBP

A key challenge in effectively implementing the CRBP in Zambia is the limited technical capacity among key stakeholders, including CSOs, the private sector, and government agencies. Despite efforts to raise awareness and build capacity, stakeholders often lack the specialised knowledge, resources, and institutional mechanisms necessary to fully integrate the CRBP into business operations, corporate regulations, and national policies. The 2010 Zambia Pre-Consultation on CRBP highlighted similar challenges, particularly concerning stakeholder awareness, enforcement capacity, and corporate engagement; however, many of these issues remain largely unaddressed.

Findings from the 2010 pre-consultation revealed that, while CSOs play a critical role in advocating for child rights, many lack the technical expertise needed to engage effectively with businesses and government institutions. The consultation highlighted the necessity for structured training programmes to enable CSOs to integrate child rights monitoring, corporate engagement, and regulatory advocacy into their operations. However, more than a decade later, these gaps persist, hindering CSOs' ability to monitor corporate compliance, assist businesses in implementing child-friendly policies, and develop evidence-based advocacy strategies.

Similarly, government institutions, including labour regulatory bodies, child protection agencies, and business oversight authorities, continue to struggle with enforcement due to underfunding, insufficient labour inspection capacity, and weak inter-agency coordination. The 2010 consultation emphasised that, while Zambia had ratified international conventions on child labour, enforcement has remained inconsistent due to limited government capacity and a reliance on businesses to self-regulate. These issues continue to be relevant today, as labour inspectors and government agencies often lack the necessary training and resources to enforce CRBP effectively.

The 2010 pre-consultation indicated that businesses perceived their influence on child rights as primarily limited to child labour, while broader aspects of corporate responsibility, such as supply chain accountability, environmental impact, and workplace policies, were largely neglected. This perception persists

today, with many businesses viewing CRBP as an external compliance obligation rather than an integral component of sustainable business practices.

Furthermore, the lack of structured training programmes for businesses hinders efforts to integrate child-friendly policies into their operations. The 2010 consultation recommended the development of corporate training programmes and the incorporation of CRBP within business ethics guidelines; however, few businesses have participated in formal CRBP training, and sector-specific child rights programmes remain largely absent.

3. **Gaps in Multi-Stakeholder Collaboration**

One of the key opportunities for advancing the CRBP in Zambia lies in establishing a structured multi-stakeholder framework that unites government, businesses, and CSOs. Although individual stakeholders have participated in CRBP discussions, these efforts have largely occurred in isolation, resulting in fragmented advocacy and limited impact. The lack of an institutionalised mechanism for continuous collaboration, accountability, and sustained advocacy presents an opportunity to create a coordinated approach for integrating child rights into business and governance structures.

Despite attempts to establish a coordinating platform, there is no evidence that the child rights business group proposed in 2010 was ever formed. Consequently, CRBP discussions have remained restricted to select circles, such as Save the Children Zambia and UNICEF, rather than being mainstreamed into national business and human rights policy discussions. In the absence of a structured dialogue mechanism, businesses engage with CRBP on an ad hoc basis, rather than through a sustained, coordinated approach.

Currently, there is no regular forum for businesses, CSOs, and government agencies to participate in structured dialogue on child rights and business accountability. This lack of coordination has resulted in duplicated efforts, inconsistent messaging, and missed opportunities for joint advocacy, particularly regarding CSO participation in national dialogues on the NAP on Business and Human Rights, capacity-building initiatives, and policy influence. Without a dedicated multi-stakeholder engagement strategy, CRBP remains a voluntary concept with no clear roadmap for long-term integration into corporate and policy frameworks.

Additionally, private sector engagement remains sporadic, lacking a clear mechanism to guarantee sustained business commitment to child rights. While some businesses have adopted child-friendly policies, their implementation lacks oversight, and there is no systematic approach to track corporate adherence to CRBP principles. This inconsistency has led to businesses disengaging after initial training or signing commitments, perceiving CRBP as a one-time compliance activity rather than an integral part of their operations.

The absence of a multi-stakeholder framework also means there is no accountability mechanism to ensure that government agencies, businesses, and

CSOs follow through on their CRBP commitments. Without a formalised, government-led structure that integrates CRBP into business regulations, corporate policies, and public policy discourse, advocacy efforts will likely continue to operate in silos, limiting their long-term impact.

v. Short-Term Project Funding

Sustaining Children's Rights and Business Principles (CRBP) advocacy in Zambia presents a vital opportunity for long-term investment and multi-stakeholder collaboration. The Save the Children Swedish-funded CRBP project has significantly contributed to building the capacity of civil society organisations (CSOs), fostering private sector engagement, and advancing policy advocacy, thereby establishing a strong foundation for the integration of CRBP. However, following the project's conclusion in 2022, there is an urgent need for dedicated financial resources to continue and expand these efforts.

One critical avenue for ensuring the sustainability of CRBP is by positioning it as a cross-cutting issue within both government and CSO programmes. By integrating CRBP into existing national policies on child rights, corporate governance, labour laws, and business regulations, it can become a core component of institutional frameworks, thereby reducing reliance on stand-alone funding cycles. Additionally, mainstreaming CRBP into CSO-led initiatives in areas such as education, social protection, and human rights advocacy would guarantee that child rights in business remain a priority across various sectors.

With consistent funding and institutional integration, CSOs can maintain momentum, raise awareness of CRBP, and strengthen engagement with business and government stakeholders. Expanding independent funding sources will enable trained CSOs to continue implementing CRBP-focused activities beyond donor project cycles, ensuring that advocacy efforts remain sustainable and impactful. Furthermore, securing long-term financial commitments would support the establishment of structured mechanisms for private sector engagement, allowing businesses to receive ongoing training, compliance monitoring, and support in implementing child-friendly policies.

By embedding CRBP as a cross-cutting issue in national and civil society programmes, alongside sustained financial support, it can transition from a time-limited initiative into a lasting framework for corporate responsibility in Zambia. This approach would ensure that child rights remain a key priority in business operations and governance structures, reinforcing accountability and long-term impact.

vi. *Limited Engagement with the Informal Sector*

The 2020 Child Labour Report reveals the extensive involvement of children in Zambia's work activities, with an estimated 2,796,813 children engaged in various forms of employment. The agriculture, forestry, and fishing sectors account for 58.3% of child workers, followed by construction, quarrying, and informal trade, where children often face exploitation, low wages, and hazardous conditions. A significant number of these children work in unregulated environments, with over 40% of those in paid employment lacking formal legal protections, complicating the

enforcement of child labour regulations. The highest incidence of child labour occurs in Eastern Province (29.8%), while Western Province records the lowest rate at 1.2%. Additionally, hazardous child labour remains a pressing issue, with over 29,057 children exposed to dangerous conditions, particularly in mining, construction, and quarrying.

The lack of social protection for the children of informal workers further intensifies vulnerabilities related to child labour. Many parents and guardians in the informal sector do not have access to essential services, such as childcare, maternity leave, and health insurance, which creates economic instability. This instability often forces children to leave school to contribute to family income, thereby perpetuating cycles of poverty and child labour. The absence of structured support for informal workers means that families frequently rely on child labour as their only option, particularly in economically disadvantaged communities.

Findings from the 2010 Zambia Pre-Consultation on CRBP similarly identified the informal sector as a significant challenge, noting that substantial policy interventions have yet to be implemented. The consultation highlighted that low adult wages exacerbate child labour, while corporate environmental degradation disproportionately affects children, particularly through pollution and deforestation near informal settlements. Moreover, weak regulatory oversight in supply chains, especially in agriculture and domestic work, hinders the tracking of child labour violations.

Despite these challenges, CRBP advocacy efforts have historically focused on formal businesses, inadvertently overlooking the informal economy, where the majority of child labour violations occur. The lack of targeted CRBP interventions in the informal sector has hindered progress in addressing child labour, environmental hazards, and social protection for informal workers and their children. Without structured engagement, informal businesses remain outside regulatory frameworks, allowing exploitative labour conditions to persist without accountability mechanisms.

To address these challenges, Zambia has the opportunity to strengthen legal protections for children in the informal sector, enhance social protection measures for informal workers, and reinforce enforcement mechanisms in high-risk industries. By implementing structured Child Rights Business Principles (CRBP) initiatives tailored to informal businesses and revitalising the Child Rights Business Group, Zambia can create a more inclusive and comprehensive child rights framework that spans all economic sectors, ensuring that every child is protected and empowered to thrive.

6. Concluding Remarks

The 2010 Zambia Pre-Consultation on CRBP laid a strong foundation for advancing corporate responsibility in child rights protection, highlighting key areas such as workplace policies, supply chain accountability, and environmental considerations. Since then, Zambia has made notable progress, including legislative reforms, increased civil society engagement, greater private sector awareness, and strengthened participation in global human rights commitments.

While these advancements demonstrate a growing commitment to integrating child rights into business practices, there remain opportunities to further strengthen legal enforcement, corporate accountability, and multi-stakeholder collaboration. Enhancing (CRIAs, expanding supply chain due diligence, and reinforcing labour inspection systems will help businesses transition from voluntary compliance to structured and measurable commitments. Additionally, fostering a national multi-stakeholder platform will encourage collaborative engagement between government, businesses, and civil society, ensuring a coordinated and sustainable approach to CRBP implementation

A critical area for further focus is extending CRBP strategies to Zambia's informal economy, where a significant portion of child labour is prevalent. By integrating child protection principles into informal business practices, expanding social protections for informal workers, and strengthening community-based monitoring, Zambia can create a more inclusive and protective business environment for children.

By working together, the government, the private sector, and CSOs can drive meaningful change, ensuring that corporate responsibility for child rights becomes an integral part of Zambia's economic and governance landscape. The following recommendations outline targeted actions for each stakeholder group to achieve this vision.

7. Key Recommendations for Strengthening CRBP Implementation in Zambia

a. Recommendations for the Government

i. Strengthening Legal and Policy Frameworks

- **Mandate CRBP Compliance** – Integrate CRBP into national labour laws, corporate governance regulations, and child protection frameworks to ensure compliance beyond voluntary adoption.

- **Strengthen Child Labour Legislation** – Align child labour laws with international best practices, ensuring clear definitions of hazardous and light work to close loopholes that enable exploitation.

- **Enhance Regulatory Oversight** – Strengthen government enforcement agencies, such as the Ministry of Labour, Ministry of Commerce, and Ministry of Community Development, to monitor and enforce business compliance with child rights protections.

- **Improve Supply Chain Accountability** – Establish clear regulations requiring companies to conduct child rights due diligence within their supply chains, particularly in high-risk sectors such as agriculture, domestic work, and mining.

- **Finalise and Implement the National Action Plan (NAP) on Business and Human Rights** – Ensure meaningful participation of child rights organisations in shaping business accountability measures, with a focus on child labour prevention and corporate responsibility.

- **Require Child Rights Integration in Business Licensing and Investment Laws** – Establish legal requirements for businesses to implement child-friendly policies as part of the company registration and investment approval process.

b. Investing in Enforcement Capacity

- **Increase Funding for Labour Inspection Systems –** Address issues of underfunding, understaffing, and lack of training for labour inspectors and business regulators to enhance workplace oversight and compliance monitoring.

- **Develop Child Rights Impact Assessments (CRIAs) –** Require businesses to evaluate, prevent, and mitigate their impact on children's rights in their operations, supply chains, and environmental policies.

- **Strengthen the Role of Labour Inspectors and Social Welfare Officers –** Train inspectors and community child protection officers to identify and prevent violations of children's rights in workplaces and supply chains.

- **Expand Protection for Informal Sector Workers –** Introduce social protection schemes, such as childcare services, health insurance, maternity benefits, and financial support, to alleviate the economic pressures that drive child labour.

- **Enhance Data Collection and Monitoring –** Establish a national database on child labour, corporate compliance, and social protections to track business accountability and inform policy decisions.

- **Improve Corporate Environmental Accountability –** Enforce child-sensitive environmental policies, particularly in mining, manufacturing, and industrial sectors, to protect children from pollution and hazardous waste.

c. Recommendations for Businesses/Private Sector

- A comprehensive approach to implementing CRBP requires action at both the individual business level and within business associations and networks to promote sector-wide change and accountability. The following recommendations outline practical steps for businesses to integrate CRBP into their policies, operations, and CSR strategies.

d. Strengthening CRBP within Business Associations and Networks

- **Integrate CRBP into Industry Standards and Business Codes of Conduct** – Business associations, including the Zambia Chamber of Commerce and Industry (ZACCI), the Zambia Association of Manufacturers (ZAM), the Zambia Chamber of Mines (ZCM), the Association of Zambian Mineral Exploration Companies (AZMEC) and the Zambia Federation of Employers (ZFE) should adopt policies aligned with CRBP and encourage members to implement child-friendly workplace practices.

- **Promote Peer Learning and Knowledge** Sharing – Establish CRBP working groups within industry networks where businesses can exchange best practices, discuss challenges, and develop collaborative child rights initiatives

- **Advocate for CRBP Policy Integration** – Business associations should collaborate with policymakers to ensure that CRBP principles are incorporated into national corporate governance frameworks, investment regulations, and procurement policies.

- **Encourage Collective Supply Chain Oversight** – Facilitate joint monitoring efforts across industries to ensure that subcontractors and suppliers adhere to child rights protections, particularly in the agriculture, mining, and manufacturing sectors.

- **Support Self-Regulation and Certification** – Develop voluntary certification schemes that recognise businesses meeting child-friendly workplace and supply chain standards, thereby promoting consumer trust and enhancing brand reputation.

- **Collaborate with International Business Networks** – Engage with global CRBP initiatives, such as the UN Global Compact, to align with international best practices.

e. Individual Business Actions to Strengthen CRBP Implementation

- **Develop and Implement Child-Friendly Workplace Policies –** Create family-friendly work environments that encompass paid parental leave, flexible work schedules, childcare facilities, and educational support for employees' children.

- **Ensure Living Wages for Workers –** Adopt fair compensation policies that consider caregiving responsibilities, alleviating economic pressures that contribute to child labour and school dropouts.

- **Conduct Child Rights Due Diligence – I**mplement risk assessments and monitoring systems to identify child rights risks within business operations, supply chains, and areas affected by environmental impacts.

- **Strengthen Supply Chain Accountability –** Require suppliers, contractors, and subcontractors to sign child protection agreements, undergo independent child labour audits, and establish zero-tolerance policies for child exploitation.

- **Integrate CRBP into Investment and Procurement Policies –** Ensure that child-friendly standards are included as criteria in business investments, joint ventures, and procurement processes.

f. Enhancing Business Capacity on CRBP

- **Develop CRBP Training for Businesses –** Introduce sector-specific training programmes for the agriculture, mining, manufacturing, and services industries to increase awareness of corporate responsibility beyond labour compliance.

- **Promote Ethical Business Practices –** Highlight case studies of companies that have effectively integrated CRBP into their operations, emphasising the economic and reputational benefits of ethical business practices.

- **Establish Corporate Child Protection Policies –** Require companies to incorporate CRBP principles into their policies, codes of conduct, and ethical guidelines, ensuring clear mechanisms for reporting, addressing, and preventing child rights violations.

- **Establish Responsible Advertising and Marketing Practices –** Ensure the use of ethical marketing strategies that do not exploit children or expose them to inappropriate commercial content, including digital advertising and social media campaigns.

- **Introduce Business Incentives for CRBP Compliance –** Collaborate with government agencies and regulatory bodies to offer tax incentives, sustainability awards, and investment benefits for companies that demonstrate best practices in CRBP compliance.

g. Corporate Social Responsibility (CSR) and Community

- **Increase Investments in Education and Child Welfare** – Provide funding for scholarships, mentorship programmes, vocational training, and school infrastructure in the communities where businesses operate.

- **Mitigate Environmental Risks Impacting Children** – Implement child-sensitive environmental and sustainability policies to reduce exposure to pollution, hazardous waste, and deforestation in proximity to schools and residential areas.

- **Facilitate Transitions for the Informal Sector** – Invest in programmes that assist informal businesses in transitioning to formal, child-friendly operations, ensuring safe working environments and the elimination of exploitative child labour practices.

h. Recommendations for Civil Society Organisations (CSOs)

1. Capacity Building and Advocacy

- **Enhance Technical Expertise on CRBP –** Provide specialised training for CSOs to strengthen monitoring of business compliance, corporate engagement, policy advocacy, and multi-sector collaboration.

- **Strengthen Evidence-Based Advocacy –** Improve data collection, research, and reporting on child labour, supply chain violations, and business accountability for child rights, ensuring that advocacy is supported by empirical evidence.

- **Advocate for CRBP Integration into Business Regulations –** Collaborate with lawmakers, government agencies, and regulatory bodies to ensure that CRBP principles are embedded in corporate governance frameworks and national policies.

- **Engage in Strategic Litigation and Legal Reforms –** Partner with human rights lawyers to challenge child rights violations in corporate practices, advocating for stronger enforcement mechanisms and penalties for non-compliance.

- **Increase Public Awareness on CRBP –** Conduct national awareness campaigns to educate communities, businesses, and policymakers on the importance of corporate responsibility in protecting children's rights.

- **Empower Children's Voices in CRBP Advocacy –** Ensure children's participation in discussions on corporate accountability, enabling them to share their lived experiences and influence policy decisions.

2. Strengthening Multi-Stakeholder Engagement

- **Facilitate Dialogue Between Businesses, Government, and Communities –** Establish multi-sectoral forums where civil society organisations (CSOs), businesses, and government agencies can engage in regular discussions on the implementation and compliance of Child Rights and Business Principles (CRBP), as well as best practices.

- **Promote Business and Human Rights Networks –** Enhance CSO participation in regional and international networks, such as the UN Global Compact, UNICEF's Responsible Business Conduct initiatives, and the African Coalition on Corporate Accountability, to share best practices and influence policy reforms.

- **Hold Businesses Accountable Through Public Reporting –** Develop CRBP scorecards and corporate responsibility rankings that recognise businesses demonstrating a commitment to protecting child rights, while exposing non-compliant companies.

- **Strengthen Partnerships with Media –** Provide training for journalists and investigative reporters on business and human rights issues, encouraging coverage of corporate accountability related to child rights violations.

3. **Extending CRBP to the Informal Sector**

- **Support Informal Workers with Legal Protections –** Advocate for social protections, legal recognition, and labour rights for informal workers to diminish reliance on child labour and exploitation.

- **Monitor and Report Child Labour Violations –** Enhance community-based monitoring systems to ensure that informal supply chains are included in CRBP oversight mechanisms.

- **Engage Traditional and Community Leaders –** Collaborate with chiefs, local authorities, and grassroots organisations to integrate child rights protections into customary business practices and informal labour regulations.

- **Develop Training and Awareness Programs for Informal Businesses –** Equip small-scale business owners, street vendors, and domestic employers with knowledge of child rights and ethical labour practices.

- **Promote Child-Friendly Alternatives for Informal Sector Workers –** Support microfinance programmes, vocational training, and business development initiatives to reduce families' reliance on child labour.

ETHIOPIA

A CRITICAL REVIEW OF CHILD RIGHTS, LABOUR PRACTICES, AND ECONOMIC REALITIES IN ETHIOPIA'S GARMENT INDUSTRY

A Critical Review of Child Rights, Labour Practices, and Economic Realities in Ethiopia's Garment Industry

1. Ethiopia's Garment Industry: An Evolving Landscape

Ethiopia's garment industry has been a crucial component of the country's industrialisation strategy, which aims to transform the economy through manufacturing and export-led growth. Prior to 2021, the sector witnessed substantial expansion, driven by foreign direct investment (FDI), preferential trade agreements, and a low-cost labour market. Under the Growth and Transformation Plan II (GTP-II, 2015-2020), the Ethiopian government prioritised the textile and garment sector, establishing several industrial parks and positioning Ethiopia as a competitive entity in global apparel production.[2]

One of the most significant drivers of this expansion was the African Growth and Opportunity Act (AGOA), which granted Ethiopia duty-free access to the U.S. market, leading to a boom in exports.[3] In 2020, Ethiopia's exports to the U.S. were valued at $525 million, with 45.3% benefiting from AGOA preferences.[4] The establishment of industrial parks such as Hawassa Industrial Park, Bole Lemi, and Mekelle has significantly enhanced Ethiopia's position in global textile production. Hawassa Industrial Park, in particular, has emerged as a major hub, attracting international apparel brands and providing employment for over 35,000 workers at its peak. These industrial parks were designed to serve as catalysts for job creation, skills development, and economic transformation, offering structured employment opportunities to thousands of individuals.

However, despite these advancements, vulnerabilities persist in terms of labour rights, workplace conditions, and protections for young workers, women,
and children.

A comprehensive assessment, commissioned by Save the Children in Ethiopia and conducted by The Centre for Child Rights and Business, Ripple Research, and the Organisation for Social Development, sought to examine these vulnerabilities in detail. Conducted between September and December 2021, the study aimed to identify risks affecting workers, particularly young and female employees, while offering recommendations to strengthen child safeguarding and labour protections within Ethiopia's garment supply chain. By integrating qualitative and quantitative research methods, including factory assessments, worker surveys, and expert consultations, the study provided an in-depth analysis of systemic challenges, labour practices, and corporate responsibilities in the sector.

The 2021 assessment of Ethiopia's garment sector identified several vulnerabilities that threatened the industry's sustainability and the welfare of its workers. Concerns were raised regarding low wages and poor working conditions, which left many garment workers struggling to meet their basic needs. The report also highlighted the exclusion of young workers aged 15 to 17 from formal employment, pushing them into informal and often exploitative work environments. Persistent challenges such as gender-based discrimination and the lack of adequate protections for female workers were also noted, alongside weak enforcement of labour laws and insufficient monitoring of child labour risks.

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[2] UNIDO, *On the Path to Industrialization: A Review of Industrial Parks in Ethiopia*, 2023, p. 8, https://documents1.worldbank.org/curated/en/099350011132228872/pdf/P1741950a12ef10560af5008750d1393b7c.pdf

[3] World Economic Forum, *How has the African Growth and Opportunity Act (AGOA) benefited African Countries?* https://www.weforum.org/stories/2023/11/africa-us-trade-agoa-deal-expires-2025/

[4] Ibid

Furthermore, concerns regarding supply chain capacity, particularly in subcontracted and home-based garment work, underscored the need for greater accountability in ensuring ethical labour practices. Since this assessment, several significant developments have reshaped Ethiopia's garment sector, necessitating a reassessment of their impact on young workers and overall labour conditions.

A key shift was Ethiopia's suspension from the African Growth and Opportunity Act (AGOA) in January 2022 due to concerns over human rights violations. This policy change led to a rapid decline in garment exports to the U.S., previously Ethiopia's largest apparel market. The consequences were particularly severe for industrial parks such as Hawassa, where 18 foreign companies departed, resulting in over 11,500 workers losing their jobs. By 2022, Ethiopia's total garment exports had fallen by 45 per cent, leading to decreased industrial productivity and diminished investor confidence. The loss of duty-free access rendered Ethiopian-made garments less competitive compared to those from Bangladesh and Vietnam, further exacerbating the crisis facing local manufacturers.

Economic instability has intensified these challenges, with the Ethiopian birr depreciating by over 50 per cent since 2021, rendering it one of the most devalued currencies in Africa. Inflation has surged, making it increasingly difficult for garment manufacturers to import essential raw materials such as fabrics, dyes, and machinery. Foreign exchange shortages have further restricted factories' ability to procure textile machinery and raw inputs, compelling many manufacturers to reduce production volumes, delay orders, or cease operations altogether.

The combination of these economic pressures has not only rendered the industry less attractive to foreign investors but has also reduced employment opportunities for young workers, many of whom now find themselves seeking livelihoods in unregulated and precarious informal employment.

The COVID-19 pandemic and broader shifts in global supply chains have significantly destabilised Ethiopia's garment sector. Unlike competing garment-producing countries such as Bangladesh and Vietnam, which successfully expanded their exports to Europe and regional markets, Ethiopia has struggled to secure new trade agreements beyond the African Growth and Opportunity Act (AGOA). The country's heavy reliance on U.S. buyers meant that when trade restrictions were imposed, it lacked the necessary logistical infrastructure, diversified trade partnerships, and supply chain

networks to quickly pivot to alternative markets. These logistical constraints, combined with limited access to global fashion brands, further hindered Ethiopia's ability to recover lost market share, resulting in stagnation in garment production and an overall decline in formal employment opportunities.

As factories closed or reduced their operations, thousands of workers, particularly young women, turned to informal employment, where protections such as paid maternity leave, fair wages, and workplace safety regulations are virtually non-existent. Many former factory workers have transitioned to home-based garment production and informal subcontracting, sectors that are challenging to monitor and regulate.

The rise in informal work has raised concerns about child labour, as economic desperation compels families to send their young children into informal sewing workshops, where labour laws are poorly enforced. Gender-specific workplace challenges also persist, with many female workers in informal settings lacking protections against harassment, wage discrimination, and exploitative working conditions. The weak enforcement of labour laws, particularly in the informal sector, has left many

workers vulnerable to abuse, further undermining the progress made in strengthening labour rights in Ethiopia's garment sector over the past decade.

Given these developments, this updated assessment is essential for understanding the impact of the decline of Ethiopia's garment sector on young workers. By revisiting the findings from the 2021 report, this study aims to provide an evidence-based analysis of employment trends, informal labour dynamics, wage stagnation, and labour rights protections.

The insights gathered will assist policymakers, industry stakeholders, and civil society organisations in identifying strategies to stabilise employment opportunities, improve working conditions, and safeguard labour rights in Ethiopia's evolving garment sector.

KII conducted with CSOs and private sector stakeholders, particularly those companies involved in the 2021 assessment, provide critical insights into the progress made since the report's publication, the existing gaps, and important recommendations for the future. This reassessment aims to inform policy reforms, private sector initiatives, and advocacy efforts, ensuring that Ethiopia's garment industry continues to serve as a catalyst for inclusive and sustainable economic development.

2. Policy & Legal Frameworks: Progress, Gaps & Implementation Challenges

a. Child Rights Legal Framework in Ethiopia's Garment Industry

- Ethiopia has ratified several international and regional conventions that establish a framework for child rights and labour protections in the garment sector. The country is a signatory to the United Nations Convention on the Rights of the Child (CRC), the African Charter on the Rights and Welfare of the Child (ACRWC), ILO Convention No. 138 on Minimum Age, and ILO Convention No. 182 on the Worst Forms of Child Labour. These agreements commit Ethiopia to the prevention of child labour, the ensuring of safe working conditions, and the upholding of the rights of young workers.

- At the national level, Labour Proclamation No. 1156/2019 serves as the principal legal framework governing employment conditions, including regulations pertaining to child labour. The proclamation establishes the minimum working age at 15 years and prohibits young workers (aged 15-17) from engaging in hazardous work, night shifts, overtime, and weekend employment. Additionally, it provides maternity protections, which include 30 days of paid prenatal leave and 90 days of paid postnatal leave, and prohibits dismissal on the grounds of pregnancy.

- The National Children's Policy (2017) reinforces protections against child labour by advocating for enhanced access to education and the eradication of exploitative labour practices. However, KII and 2021 assessment revealed that implementation remains weak, and there are no established mechanisms in place to monitor and prevent child labour in the garment sector.

- Despite the presence of these legal frameworks, the 2021 assessment revealed significant gaps in implementation and contradictions between national and international labour standards. A critical issue is that factories enforce an unofficial minimum hiring age of 18 to align with the expectations of international buyers, which effectively excludes 15-17-year-olds from formal employment. Consequently, many young workers have been compelled to enter informal garment production, where working conditions are hazardous, wages are unregulated, and

legal protections are lacking.

- KIIs conducted with private sector actors confirmed that international brands require Ethiopian factories to adhere to ethical sourcing policies that prohibit the employment of workers under the age of 18, despite Ethiopian law permitting such practices. Consequently, factories refrain from employing young workers to mitigate compliance risks and protect their reputations. This contradiction results in a policy loophole, where domestic labour laws allow for youth employment, yet international pressures deter factories from hiring them.

- International sourcing audits, such as those mandated by the Ethical Trading Initiative (ETI) and major U.S. and European brands, necessitate stringent age verification processes. Factory managers interviewed expressed concerns regarding the potential for contract termination or penalties from buyers if underage workers (even those legally employable under Ethiopian law) are identified within their workforce. This highlights the considerable influence of global brands on factory hiring practices, which frequently leads to exclusionary policies that conflict with Ethiopia's legal framework.

b. Enhancing Child Labour Monitoring and Strengthening Compliance Mechanisms

The Ministry of Labour and Social Affairs (MoLSA) plays a crucial role in ensuring compliance with child labour laws and conducting inspections within Ethiopia's garment sector. The 2021 assessment acknowledged the government's commitment to enforcing child labour regulations but also identified areas needing improvement. In 2021, MoLSA operated with 621 labour inspectors nationwide, which was below the ILO-recommended ratio of one inspector for every 40,000 workers. This shortfall poses challenges in maintaining consistent monitoring across the industry. Expanding the capacity and resources for labour inspection would significantly enhance the government's ability to conduct proactive and regular inspections, thereby ensuring greater compliance in both formal and informal sectors employment settings.

KIIs with industry stakeholders revealed that current inspection efforts primarily concentrate on formal factories, where compliance audits are more straightforward to perform. Enhancing oversight in subcontracted garment production and home-based garment work sectors where young workers are predominantly employed would significantly strengthen child labour protections. Focusing on these areas would ensure that Ethiopia's child labour monitoring system is comprehensive and inclusive, effectively covering all levels of the supply chain.

The lack of a centralised data system has impeded efforts to assess the extent of young workers' participation in the garment sector, particularly in informal work environments. In the absence of comprehensive data, it becomes difficult to quantify child labour violations, identify at-risk groups, and understand the full implications of youth employment trends in the informal sector. This data deficiency limits policymakers and stakeholders from developing evidence-based interventions that effectively address labour rights issues.

An opportunity for improvement exists in developing a centralised data collection system to monitor child labour violations. KIIs highlighted that a well-structured, accessible database would enable stakeholders, including government agencies, civil society organisations, and labour rights advocates to collaborate effectively in tracking trends and designing targeted interventions. Strengthening information-sharing mechanisms would promote a more transparent and data-driven approach to child labour monitoring, ensuring that interventions are timely, targeted, and responsive to emerging labour trends.

Ethiopia has made significant strides in aligning its labour laws with international standards. To further demonstrate its commitment to protecting young workers, the country can enhance its labour inspection and data systems. Expanding labour oversight to encompass subcontractors and home-based garment production will promote comprehensive compliance across the industry.

Additionally, partnering with civil society organisations to improve the monitoring of child labour will provide essential support in ensuring safe and ethical working conditions for all young workers.

c. From Policy to Practice: Evaluating Progress and Persistent Gaps in Ethiopia's Garment Industry

i. Labour Market & Employment Opportunities

In In 2021, the assessment revealed that Ethiopian factories did not employ workers aged 15-17, despite national labour laws allowing employment from the age of 15 under specific protective conditions. All six surveyed factories had established their minimum hiring age at 18 or higher, with some requiring workers to be at least 19 or even 26 years old for eligibility. This exclusionary hiring practice was primarily influenced by international buyer requirements, which necessitate stringent age verification procedures to ensure compliance with ethical sourcing standards. Consequently, rather than implementing protective employment options for young workers, factories chose to exclude all workers under 18 entirely. This practice has driven many young workers into informal employment, where working conditions are unregulated and legal protections are minimal.

The establishment of industrial parks aims to stimulate large-scale employment. Although accessibility continues to be a challenge for younger workers, these industrial zones present an opportunity for targeted youth employment initiatives. By enhancing vocational training partnerships, apprenticeships, and entry-level hiring programmes, factories can create a structured pathway into formal employment for young workers, equipping them with essential skills and career development opportunities.

Businesses in the garment sector continue to navigate complex regulatory environments while balancing international labour standards with local employment needs. Supporting factories in the implementation of youth-friendly hiring practices that comply with international sourcing requirements and enable young workers to engage in formal employment will help bridge the gap between labour market policies and the realities of workforce participation.

The Ethiopian government plays a crucial role in expanding enforcement mechanisms that support structured youth employment. By strengthening collaboration between government bodies, the private sector, and CSOs, the alignment of industrial policies with employment generation strategies can be achieved. This will ensure that Ethiopia's economic growth translates into greater opportunities for young workers in the formal labour market.

Expanding opportunities for young workers to enter the formal sector will reduce their reliance on informal employment, which often lacks protections and benefits. By implementing policies that support inclusive hiring, skills training, and regulatory oversight, Ethiopia can enhance economic mobility for young garment workers and improve labour conditions across the industry.

Investing in structured training and career development programmes will ensure that young workers acquire industry-relevant skills, preparing them for stable and productive employment. This strategy will create long-term career pathways, rather than leaving them in precarious, short-term roles.

For rural-to-urban migrant workers, improving access to stable employment in Ethiopia's industrial sector can alleviate financial insecurity, enhance social integration, and offer sustainable livelihood options. Strengthening worker protections will further ensure that migrants receive fair wages, work in safe environments, and have access to social support systems that aid their success.

A well-regulated garment sector will foster a more secure and equitable labour environment for young workers, guaranteeing that employment practices promote fair wages, decent working conditions, and transparent hiring processes. As Ethiopia continues to expand its industrial footprint, there is an opportunity to cultivate a more resilient and inclusive workforce, ensuring that young workers can thrive in a stable and well-regulated garment industry.

External economic pressures, including Ethiopia's suspension from AGOA, inflation, and shifts in global supply chains, have affected employment stability in the garment sector. However, diversifying trade partnerships, enhancing local supply chains, and supporting industrial parks to retain production capacity can help mitigate these effects and provide greater employment security for young workers.

By concentrating on policy innovation, workforce development, and industry collaboration, Ethiopia's garment sector can become a model for ethical, inclusive, and sustainable employment. Addressing labour challenges with practical, forward-thinking solutions will not only benefit young workers but also strengthen Ethiopia's competitive position in the global apparel market.

ii. Wages, Cost of Living & Financial Stability in Ethiopia's Garment Industry: 2021-2024 Update

In 2021, garment workers in Ethiopia received the lowest wages among major garment-producing countries. The average monthly wage was 2,415 ETB (~44 EUR), which was significantly below the estimated living wage of 6,520 ETB. A study conducted by the University of Delaware highlighted Ethiopia's low wage levels in comparison to other garment hubs, such as Bangladesh (55 EUR/month) and Kenya (163 EUR/month)[5]. Ninety-two percent of surveyed workers indicated that their wages did not cover basic expenses, and none were able to save.[6] This insufficient income fails to cover basic living expenses, compelling workers to make difficult trade-offs that often jeopardise their children's education, health, and overall well-being.

> ***"We are forced to make difficult choices when it comes to our children's education and fulfilling their basic needs. The cost of living is getting very high."***
>
> ***– Female worker.***

[5] University of Delaware (2021). *Wage Comparisons in Global Garment Industry*. Retrieved from: https://sites.udel.edu/lizs/working-conditions/
[6] Ibid

Ethiopia has yet to establish a statutory minimum wage, although discussions have increased between government agencies and labour organisations, suggesting potential regulatory changes. Despite these ongoing conversations, no legal framework has been implemented, leaving garment workers in a precarious financial situation. Additionally, the Ethiopian Birr has devalued by nearly 50% due to IMF-led financial reforms [7], further exacerbating wage erosion despite minor salary increases in some factories.

In response to economic pressures, some companies, in partnership with CSOs, have established daycare centres to support working mothers. KII respondents noted that this development has helped alleviate childcare burdens for female workers. The KII findings also highlighted that other companies have introduced subsidised meals and minor wage adjustments to assist workers in coping with the rising cost of living; however, these measures remain insufficient to address long-term financial stability.

With support from CSOs, workers' associations have been formed in some industrial parks, enabling employees to negotiate for wage increases and benefits. KII respondents emphasised that while these efforts have provided workers with a platform to voice their concerns, their bargaining power remains limited due to employer resistance and economic constraints.

Following Ethiopia's exclusion from the AGOA in 2022, some garment manufacturers have adapted by increasing domestic sales and targeting new export markets. According to KII insights, while this shift has helped stabilise employment levels, it has not fully compensated for the loss of international buyers, creating long-term uncertainty for the industry. KII respondents reiterated that the impact of AGOA's exclusion has been significant, reducing companies' ability to expand production and improve wage conditions, thereby further constraining workers' financial stability.

The rising cost of living continues to outpace wage increases, making it increasingly difficult for workers to afford basic necessities such as food, transportation, and housing. KII respondents have noted that many workers struggle to meet their daily needs without seeking alternative income sources.[8] Employers are hesitant to commit to wage increases due to market instability and reduced foreign investment. KII responses reveal that companies fear that rising production costs will render them uncompetitive in the global market.

Building on existing efforts, CSOs can play a vital role in enhancing workforce engagement by providing legal training and negotiation skills to workers' associations. This ensures that workers can participate constructively in wage discussions while maintaining a collaborative approach with employers. Expanding financial literacy programmes, particularly those that focus on budgeting and savings, can empower young workers with greater financial autonomy, enabling them to manage their income effectively and reducing their reliance on external economic pressures.

Additionally, supporting alternative livelihoods through vocational training programmes can offer young workers opportunities to diversify their income sources, fostering resilience and long-term economic stability for both individuals and their families, while complementing existing employment in the garment sector. Collaboration between CSOs, labour unions, and policymakers can facilitate discussions on sustainable wage frameworks that align with

[7] IMF (2024). Ethiopia Economic Outlook Report. Retrieved from: https://imf.org/ethiopia-economic-outlook

[8] World Bank (2023) Ethiopia Digital ID for Inclusion and Services https://projects.worldbank.org/en/projects-operations/project-detail/P179040

economic conditions and ensure that businesses remain competitive, thereby fostering a balanced approach to worker well-being and industry growth.

The private sector has the opportunity to enhance worker motivation and retention by implementing performance-based pay adjustments that align wage increases with inflation and productivity gains. Furthermore, expanding employee benefits, such as transport allowances, meal subsidies, and housing support, can contribute to the establishment of a stable and committed workforce, thereby fostering long-term industry growth. Investing in career development through structured vocational training and leadership pathways can help cultivate a highly skilled workforce, ensuring both industry sustainability and employee advancement. Additionally, enhancing transparency in wage structures fosters trust between employers and employees, promoting a more collaborative and productive work environment.

The government can further protect workers by implementing a statutory minimum wage, thereby reinforcing wage stability and competitiveness in the garment sector. The AGOA National Strategy, introduced in response to Ethiopia's exclusion from AGOA in 2022, aims to address key supply-side constraints in the garment sector.[9] This strategy seeks to enhance economic stability, promote job creation, and improve Ethiopia's global competitiveness. Establishing a wage floor would create a basis for fair and sustainable wages, aligning with broader economic objectives.

Strengthening labour law enforcement through inspections and compliance checks will uphold industry standards and ensure safer, fairer working conditions. The AGOA strategy highlights the importance of regulatory oversight in maintaining fair labour practices and protecting workers, thereby ensuring the long-term sustainability of the garment sector.

Economic policies aimed at curbing inflation and stabilising the currency will also help preserve workers' purchasing power, ensuring that wage improvements translate into real benefits.

Encouraging industry-wide wage dialogues through multi-stakeholder forums will enhance collaboration among employers, workers, and policymakers. The AGOA strategy recommends sector-wide wage consultations to align economic policies with labour market realities, ensuring a balanced and inclusive wage framework.

3. Labour Rights, Workplace Conditions and Gender Protections in Ethiopia's Garment Sector

The 2021 assessment identified substantial concerns relating to labour rights, workplace conditions, and gender protections. Poor working conditions, extended working hours, and the absence of structured grievance mechanisms contributed to elevated levels of worker turnover and absenteeism. The report also emphasised insufficient maternity protections, particularly in relation to hazardous work reassignment and accommodations for pregnant employees. Additionally, the lack of formal reporting mechanisms for sexual harassment left female workers vulnerable and with limited access to legal recourse.

[9] See AGOA.info Ethiopia - National AGOA Strategy (DRAFT) (2015) at https://agoa.info/downloads/national-strategies/5946.html

One major concern was mandatory overtime, where workers in certain factories were compelled to work beyond standard hours under the threat of job loss. This placed additional strain on employees, particularly those with childcare responsibilities.

> ***"There is a daily target and if that target is not met, we will not be allowed to leave work and we have to work extra hours. It is mandatory for everyone to finish the order. It is forced upon us, which is a problem for mothers that have to pick up their children from a day-care facility."***
>
> ***- A frontline worker***

Another key issue was the lack of parental leave and breastfeeding support. Many workers struggled to secure time off to care for sick children, and maternity leave policies varied significantly across factories.

> ***"If my kids are sick and I have to take them to a hospital or look after them at home my company will not allow me to use my annual leave to take a day off, so we are forced to choose to stay at home and have our pay check cut."***
>
> ***- A frontline worker***

Additionally, there were no dedicated breastfeeding facilities, making it challenging for new mothers to balance work and childcare.

> ***"Taking a break for breastfeeding is unimaginable in the factory because no mother can bring her child to work."***
>
> ***–A frontline worker.***

Poor living conditions also emerged as a significant problem. Many workers lived in overcrowded and inadequate housing, with unreliable access to basic services such as electricity and water. These conditions were especially dire in industrial zones, where infrastructure deficiencies severely impacted workers' overall well-being.

The recruitment process in some factories posed risks related to child labour, as informal hiring channels lacked rigorous age verification procedures. Without proper screening, there was a potential for underage workers to be employed using falsified documentation.

Furthermore, weak mechanisms for addressing workplace harassment and gender-based discrimination left workers, particularly women, vulnerable. The absence of formal grievance structures made it difficult for employees to report incidents of exploitation or abuse, limiting their access to legal recourse and workplace protections.

Since the 2021 assessment, various interventions have led to notable improvements in labour rights and workplace protections. KII with CSOs and private sector stakeholders highlighted progress in policy implementation and workplace reforms, including improvements in labour rights, gender protections, and workplace conditions. The establishment of workers' associations has enabled employees to advocate for fair wages, working hours, and leave entitlements.

These associations, supported by civil society organizations (CSOs), have successfully negotiated improved maternity and paternity leave policies in some factories, extending paid leave to four months.

Additionally, daycare centers have been introduced in certain industrial parks, providing crucial support for working mothers. Workers are now allowed dedicated time to visit their children and breastfeed during work hours. Some factories have also adopted gender policies, including child protection and sexual harassment prevention measures, contributing to a more structured and safer work environment.

In terms of recruitment practices, factories have improved ID verification and documentation checks to mitigate child labour risks. The introduction of safeguarding manuals and grievance committees has also facilitated better handling of workplace disputes, ensuring cases of exploitation and harassment are addressed more systematically. Despite these advancements, several challenges persist.

Mandatory overtime continues to be an issue, particularly during peak production periods. There is a need to strengthen enforcement mechanisms to ensure that overtime is voluntary and fairly compensated.

Although parental leave policies have improved in some factories, inconsistencies in their implementation mean that many workers still do not have adequate time off for childcare responsibilities. Additionally, while daycare facilities signify progress, their availability remains limited, and efforts should be made to expand coverage across all industrial zones.

Living conditions for workers continue to be a significant concern, with inadequate access to electricity and clean water negatively impacting health and quality of life. Greater collaboration between industrial park management and local authorities is essential to address these infrastructural deficits.

Furthermore, gender protections and workplace grievance mechanisms require further institutionalisation. While some factories have adopted gender policies, their application is inconsistent, and sexual harassment reporting mechanisms need strengthening to ensure that all workers, particularly women, can report grievances safely and confidentially.

CSOs play a crucial role in supporting Ethiopia's garment sector by strengthening workers' collective bargaining power, increasing awareness of labour rights, and advocating for gender protections. These organisations have been instrumental in empowering workers' associations that have successfully negotiated improved parental leave policies and working conditions. Additionally, CSOs have conducted advocacy efforts focused on gender-based violence and workplace discrimination, ensuring that factories adopt and enforce relevant safeguarding policies.

The private sector, including garment factories and industry stakeholders, has made strides in implementing workplace reforms, but further steps are needed. Standardising parental leave policies across all factories is essential to ensure equitable access to maternity and paternity benefits. Expanding daycare facilities and breastfeeding support programmes within industrial parks would further assist working parents. Improved recruitment practices, including stricter ID verification, will help mitigate child labour risks while ensuring alignment with Ethiopia's legal framework. It is important that these practices do not inadvertently exclude young workers (aged 15-17) who are legally permitted to work under Ethiopian law. Recruitment

policies should integrate protective measures, such as prohibiting hazardous work, overtime, and night shifts for young workers, while facilitating their formal employment in safe conditions.

This approach would prevent young workers from being forced into informal and unregulated employment, thereby providing them with legal protections and opportunities for skills development. Additionally, enforcing gender policies and safeguarding measures can prevent workplace harassment and create a safer work environment for all employees.

The Ethiopian government has a critical role in ensuring that labour laws are properly enforced and that working conditions continue to improve. Strengthening the enforcement of existing labour laws will help ensure compliance with working hour regulations and fair wage policies. Investments in worker housing and industrial park infrastructure, particularly for electricity, water, and sanitation, are necessary to enhance living conditions. Furthermore, the government should oversee the establishment of formal grievance mechanisms in all garment factories and conduct regular monitoring and evaluation of workplace conditions to track progress on labour rights and gender protections.

By implementing these targeted recommendations, Ethiopia's garment sector can create a more equitable and sustainable working environment that benefits both workers and industry stakeholders.

4. Level of Awareness of Among Stakeholders

- **Awareness Among CSOs**

  The concept of CRBP remains relatively unfamiliar to many CSOs operating in Ethiopia. Although several CSOs are active within industrial parks, their focus is predominantly on gender-based violence prevention, health advocacy, and family planning services, rather than on issues related to CRBP. The Organisation for Social Development (OSD), with support from Save the Children International, is one of the few entities actively promoting CRBP in Ethiopia, particularly within two industrial parks. Budget constraints and a lack of exposure to the concept have limited broader CSO engagement in CRBP initiatives.

  To enhance CSO involvement, strategic awareness-raising efforts are essential. CSOs must first comprehend the importance of integrating child rights considerations into business operations. There is a need for a dedicated organisation—either international or local—to advocate for the promotion of CRBP among CSOs and assist them in incorporating these principles into their existing programmes. Furthermore, improved collaboration between CSOs could strengthen collective advocacy efforts aimed at enhancing child rights protections within Ethiopia's garment sector.

  In addition to local engagement, Ethiopian CSOs have participated in treaty reporting mechanisms, including submissions to the United Nations Committee on the Rights of the Child (CRC) and the Universal Periodic Review (UPR). Organisations like OSD participate in alternative reporting processes and help raise awareness about child rights violations in the garment industry. Through partnerships with international organisations such as Save the Children, CSOs ensure that concerns regarding child labour and labour rights in Ethiopia's garment sector are highlighted at international forums. Additionally, platforms such as the child parliament provide children with opportunities to voice their concerns to

government ministries and international bodies. These engagements facilitate dialogue with treaty reporting bodies, resulting in follow-up recommendations to the Ethiopian government from the CRC Committee and the UPR.

- **Awareness Among the Private Sector**

  Despite the increasing global emphasis on ethical business practices, awareness of the CRBP among private sector actors in Ethiopia remains limited. Many garment factories comply with international buyer requirements regarding labour rights; however, they often lack a comprehensive understanding of CRBP. While these factories typically implement child labour prevention measures to meet international supply chain standards, broader child rights issues, such as workplace policies that support working parents, gender protections, and investment in community development, receive considerably less attention.

  International brands sourcing from Ethiopia wield significant influence over labour practices. However, their focus is primarily on meeting compliance standards rather than actively promoting CRBP within local supply chains. Strengthening engagement with garment manufacturers through targeted training programmes and policy integration efforts could enhance awareness and commitment to child rights within the sector. Furthermore, incorporating CRBP into CSR strategies could encourage factories to take proactive steps in safeguarding children's rights beyond mere compliance with labour laws.

- **Awareness Among Government Agencies**

  The Ethiopian government has ratified key international treaties concerning child rights and labour protections, yet awareness of CRBP among government agencies remains inconsistent. Although labour regulations establish a legal framework for safeguarding young workers, challenges in enforcement and implementation continue to exist. The government's industrial strategies have primarily concentrated on economic growth, often neglecting the wider implications for child rights associated with business activities.

  Engagement with treaty bodies, such as the UN CRC and the Universal Periodic Review (UPR), provides a means for holding the government accountable. Ethiopian representatives have taken part in global forums and received recommendations related to child labour and youth employment policies. However, effectively translating these recommendations into tangible actions necessitates improved inter-agency coordination and the integration of CRBP principles into national labour and industrial policies.

  To enhance government awareness and responsiveness, efforts should focus on incorporating CRBP into national labour policies, industrial development strategies, and social protection programmes. Furthermore, multi-stakeholder collaborations involving civil society organisations (CSOs), the private sector, and international partners could support capacity-building initiatives for government officials, improving their understanding and implementation of CRBP.

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d. Concluding remarks

Ethiopia's garment industry has immense potential to drive sustainable economic growth, quality employment, and ethical manufacturing practices. Despite facing recent economic challenges, the sector has demonstrated resilience, making significant strides in improving workplace conditions, strengthening labour protections, and enhancing gender equality. By building on these achievements and scaling up existing initiatives, Ethiopia can establish itself as a leader in responsible and inclusive industrialisation.

Integrating Children's Rights and Business Principles (CRBP) into policy and corporate frameworks presents an opportunity to foster a fair and equitable workforce. Civil society organisations (CSOs) have played a crucial role in advocating for the protection of children and workers. Their ongoing collaboration with government agencies and the private sector will be essential for ensuring the widespread adoption of ethical business practices. Furthermore, Ethiopia's international partnerships can act as a catalyst for increased investment in skills development, supply chain sustainability, and ethical labour practices.

To maintain this progress, prioritising data-driven policy decisions and enhanced monitoring mechanisms is vital. Transparent reporting on youth employment, gender protections, and labour rights compliance will facilitate evidence-based interventions that lead to lasting change. Moreover, investing in vocational training, apprenticeships, and structured workforce development programmes will empower young workers and boost Ethiopia's competitiveness in the global apparel market.

By embracing strategic reforms, multi-stakeholder collaboration, and ethical labour policies, Ethiopia's garment sector can thrive as a sustainable and socially responsible industry. A future based on inclusive employment, fair wages, and robust worker protections will ensure that both businesses and workers prosper in an equitable and resilient industrial landscape.

e. Key Recommendations

i. For CSOs:

i. **Enhance CRBP Awareness and Integration into CSO Programs**
CSOs should develop their capacity in Children's Rights and Business Principles (CRBP) and

integrate child rights considerations into their existing advocacy initiatives. International organisations can facilitate this through training sessions and the development of resources to mainstream CRBP in industrial park engagement.

ii. **Strengthen Treaty Reporting and Collective Advocacy**
CSOs should utilise treaty reporting mechanisms, such as submissions to the CRC and UPR, to emphasise child labour and violations of labour rights. Enhancing CSO coalitions will strengthen coordinated advocacy efforts and impact national and international policy discussions.

iii. **Support Formal Employment for Young Workers**
CSOs should collaborate with factories to create structured employment programmes for workers aged 15-17, ensuring the implementation of protective measures (e.g., restrictions on hazardous work, night shifts, and overtime). This should also include vocational training and career development pathways to facilitate the integration of youth into the formal economy.

iv. **Strengthen Workers' Advocacy and Awareness**
CSOs should empower worker-led associations to advocate for fair wages, safe working conditions, and gender-inclusive policies. Training programmes should equip workers with knowledge of their labour rights, enabling them to access legal protections and grievance mechanisms.

v. **Advocate for Fair Wages and Social Protections**
CSOs should advocate for a statutory minimum wage and campaign for enhanced worker benefits, such as maternity protections, health insurance, and paid leave policies. These initiatives should be aligned with cost-of-living realities to ensure economic stability for workers.

vi. **Improve Access to Quality Childcare and Education**
CSOs should partner with businesses, industrial parks, and the government to establish affordable childcare centres and ensure that worker families have access to quality education.

vii. **Monitor Workplace Compliance and Strengthen Accountability**
CSOs should monitor labour law enforcement by collaborating with government agencies, industrial parks, and factories. Independent monitoring mechanisms and worker feedback platforms should be established to ensure that factories are held accountable.

viii. **Enhance CSO Funding and Resource Mobilisation** CSOs should pursue partnerships with international donors, private sector entities, and governmental institutions to expand CRBP initiatives into additional industrial parks. This includes submitting grant applications and developing strategic funding models to scale their impact.

ix. **Strengthen Multi-Stakeholder Collaboration** CSOs should form formal partnerships with the private sector, industrial parks, trade unions, and governmental agencies to coordinate efforts on labour rights and child protection.

x. **Develop Worker-Focused Social Protection Initiatives**
CSOs should advocate for worker welfare funds and social protection schemes, ensuring that garment workers, particularly young and female employees, have access to health insurance, maternity benefits, and financial safety nets.

xi. **Expand Workplace Grievance Mechanisms**
CSOs should collaborate with factories to establish accessible reporting systems, including

anonymous hotlines, independent grievance ombudspersons, and enhanced union representation to safeguard worker protection.

xii. **Monitor the Impact of CRBP Implementation**
CSOs should partner with research institutions and labour rights organisations to evaluate the progress of CRBP adoption in Ethiopia's garment sector. Data-driven assessments will inform policy decisions and advocacy strategies.

ii. For the Private Sector:

i. Develop Inclusive Hiring Practices

- Ensure recruitment policies do not exclude young workers (15-17 years old) who are legally allowed to work under Ethiopian labour laws.
- Provide age-appropriate job roles, training, and protective measures to prevent exposure to hazardous work, overtime, and night shifts.

ii. Enhance Workplace Protections for Women and Vulnerable Workers

- Strengthen gender-sensitive workplace policies that prevent harassment, discrimination, and unsafe working conditions.
- Establish clear grievance and reporting mechanisms to address workplace harassment and gender-based violence.
- Promote women's representation in leadership, worker committees, and decision-making roles.

iii. Improve Wages, Benefits, and Living Conditions

- Introduce structured wage reviews to align with inflation and the rising cost of living.·
- Provide subsidised meals, transport allowances, housing support, and affordable childcare to enhance worker well-being.
- Enhance access to clean water, sanitation, electricity, and worker housing in collaboration with government authorities.

iv. Strengthen Worker Participation and Support Systems

- Establish worker committees or trade unions to allow employees to participate in decisions related to wages, working conditions, and benefits.

v. Expand Training and Career Development Programs

- Invest in vocational training, technical skills development, and leadership pathways to provide workers with long-term career opportunities.
- Provide on-the-job training to upskill young workers, ensuring they transition from entry-level roles to skilled positions.

vi. Integrate CRBP into Corporate Social Responsibility (CSR) Strategies

- Embed CRBP principles within CSR initiatives by promoting child-friendly workplace policies, such as paid parental leave, childcare support, and protections for young workers.

- Develop public-private partnerships with government agencies, CSOs, and labour rights organisations to enhance sector-wide adoption of CRBP standards.

vii. Ensure Ethical Procurement and Supplier Accountability

- Implement clear due diligence policies for all suppliers and subcontractors to comply with ethical labour practices.

- Offer capacity-building support to local suppliers rather than excluding them from supply chains for non-compliance.

viii. Encourage Industry-Wide Collaboration for Systemic Change

- Work with government, CSOs, and industry associations to support wage reform, labour law enforcement, and supply chain transparency.

- Advocate for national policies that promote fair wages, safe workplaces, and inclusive employment opportunities.

iii. For the Government:

i. Strengthen Labour Law Enforcement and Compliance Mechanisms

- Expand labour inspections and monitoring systems to ensure adherence to national labour laws, particularly regarding fair wages, working hours, and protections against child labour.

- Increase funding and staffing for labour inspectors, focusing on industrial parks to facilitate regular audits and quicker resolution of labour violations.

- Establish a centralised child labour monitoring and reporting system to improve data collection, transparency, and enforcement of child protection regulations.

ii. Introduce and Enforce a Statutory Minimum Wage

- Develop a national minimum wage framework that accounts for inflation, cost of living, and global industry benchmarks, ensuring workers receive a living wage.

- Facilitate multi-stakeholder wage negotiations involving workers, employers, and industry bodies to balance business sustainability with worker welfare.

iii. Support Youth Employment and Ethical Recruitment Practices

- Ensure young workers (15-17 years old) have access to regulated employment opportunities with age-appropriate job roles, restricted working hours, and access to vocational training.

- Standardise ID verification and age assessment procedures to mitigate child labour risks while ensuring that legally eligible young workers are not excluded.

iv. Enhance Maternity Protections and Family-Friendly Policies

- Enforce maternity leave entitlements, prenatal accommodations, and workplace protections as outlined in the Labour Proclamation.

- Promote the establishment of breastfeeding facilities, flexible work arrangements, and parental leave policies in factories to support working mothers and caregivers.

v. **Invest in Industrial Infrastructure and Worker Living Conditions**
- Improve worker housing, electricity, water supply, and sanitation in industrial zones to enhance living conditions and worker productivity.

- Collaborate with the private sector and municipalities to develop safe, accessible, and affordable transportation for factory workers.

vi. **Diversify Trade Agreements and Strengthen Economic Resilience**
- Decrease reliance on AGOA and single export markets by expanding trade partnerships with Europe, Asia, and African regional markets.

- Strengthen local supply chains and domestic production capacity to enhance sector stability and competitiveness.

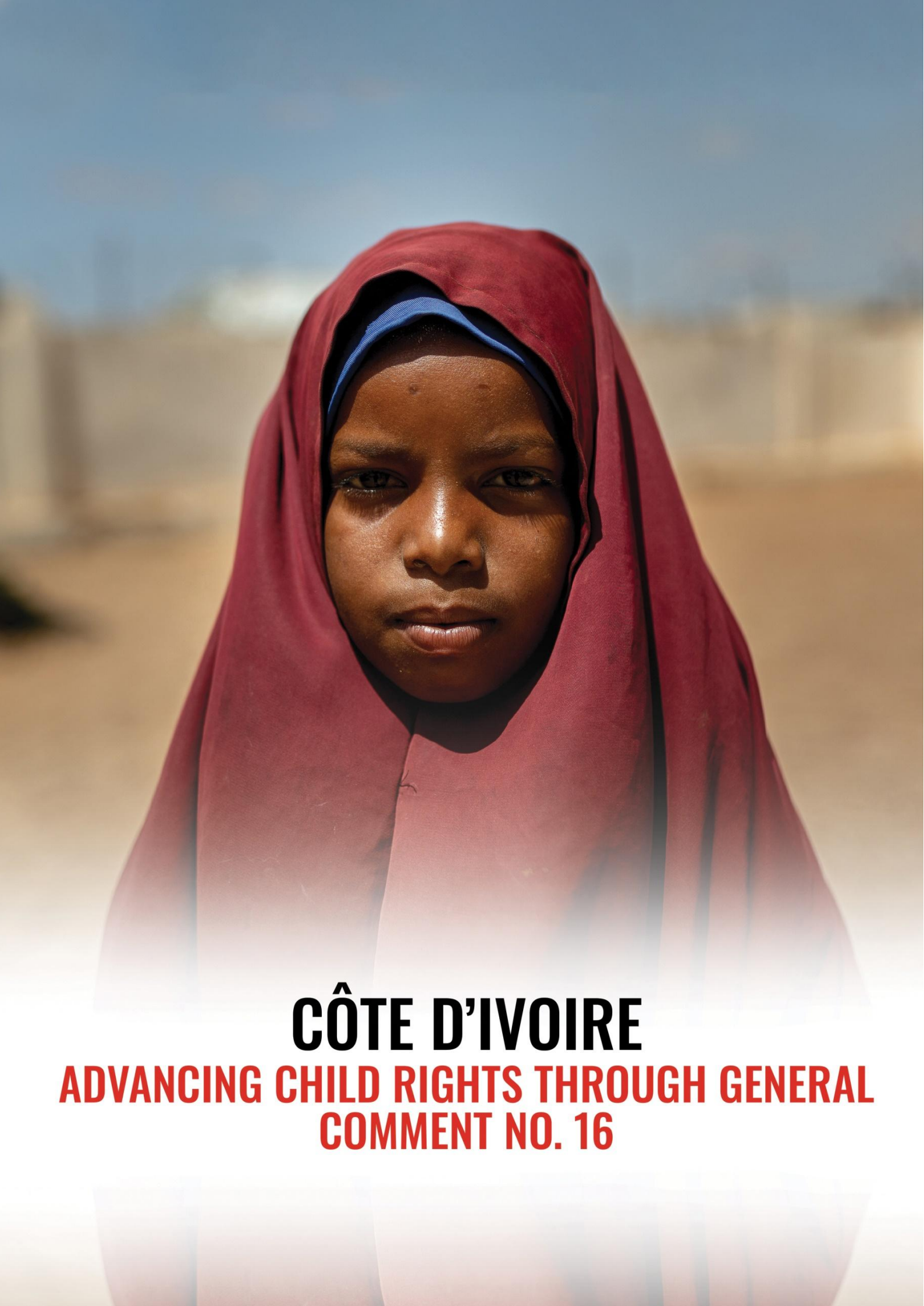
vii. **Mainstream Child Rights and Business Principles (CRBP) into National Labour and Industrial Policies**
- Ensure industrial policies align with international child rights frameworks, incorporating CRBP into national labour regulations.

- Establish legal accountability measures for companies violating child rights and labour standards, with clear penalties and compliance incentives.

viii. **Enhance Government Capacity for CRBP Implementation and Multi-Stakeholder Coordination**
- Provide government agencies with training on CRBP to improve policy enforcement, labour rights monitoring, and child welfare protections.

- Establish multi-stakeholder working groups (including CSOs, the private sector, labour unions, and treaty bodies) to strengthen coordination, knowledge-sharing, and monitoring of labour rights compliance.

- Encourage CSO participation in treaty reporting mechanisms (CRC, UPR, ILO) to enhance global accountability regarding Ethiopia's labour practices.



CÔTE D'IVOIRE

ADVANCING CHILD RIGHTS THROUGH GENERAL COMMENT NO. 16

Advancing Child Rights through General Comment No. 16

1. Introduction

Côte d'Ivoire is one of Africa's fastest-growing economies, with agriculture, mining, and informal businesses constituting its economic backbone. Despite experiencing global economic shocks, the country has exhibited resilience, positioning itself as a key driver of trade and investment in West Africa. It is projected to achieve a GDP growth of 6.4% by 2025, underpinned by robust macroeconomic fundamentals and a dynamic private sector.[10]

The country is the largest cocoa producer globally, accounting for approximately 40% of the world's cocoa production and supporting around 800,000 cocoa farmers. The majority of these farmers manage smallholdings ranging from one to three hectares, with an average annual income of $2,000. However, child labour remains a significant issue, with an estimated 1.4 million children aged 5 to 17 engaged in work across the country. Nearly half of these children (49%) are involved in agriculture, often working alongside their families under hazardous conditions.[11]

Despite Côte d'Ivoire's commitments to protecting children's rights, business activities continue to expose children to significant risks, including child labour, exploitation, limited access to education, and hazardous working conditions.
Research conducted by the International Cocoa Initiative and Save the Children estimates that nearly half of all children in cocoa-growing regions are engaged in child labour, underscoring the ongoing challenges in ensuring child protection within the industry.[12]

To address these concerns, General Comment No. 16 (GC16), issued in 2013 by the United Nations Committee on the Rights of the Child (UNCRC), provides a framework for state obligations concerning the impact of business activities on children's rights. This guidance encourages governments to ensure that businesses respect children's rights in all operations, establish and enforce legal frameworks that mandate corporate accountability, and hold businesses responsible for any adverse effects on children's well-being.

A General Comment is an authoritative interpretation issued by a UN treaty body, in this case, the UNCRC, to clarify the scope and meaning of treaty provisions and to provide guidance on their implementation. These comments assist States Parties in understanding the necessary actions to respect, protect, and fulfil the rights of children in specific areas. While they are not legally binding for States or stakeholders, including the private sector, they serve as highly influential tools for interpreting international child rights standards and promoting accountability.[13]

It is important to note that General Comments, including GC16, are not legally binding in themselves. They do not establish new legal obligations but instead provide significant guidance that reflects international best practices and evolving interpretations of child rights standards. GC16 specifically clarifies how States must ensure that business activities do not adversely affect children's rights, while acknowledging that ultimate accountability lies with the State. The General Comment underscores that

[10] ETK Group (2025) Côte d'Ivoire: Africa's Economic Powerhouse to Watch in 2025, https://www.etkgroup.co.uk/cote-divoire-africas-economic-powerhouse-to-watch-in-2025/#:~:text=Despite%20global%20economic%20shocks%2C%20C%C3%B4te,and%20investment%20in%20West%20Africa.
[11] UNICEF (2019) Promoting the Rights of children in the Cocoa Producing Areas in Cote d'Ivoire https://open.unicef.org/sites/transparency/files/2020-06/Cote-d-Ivoire-TP5-2018.pdf
[12] ICI https://www.cocoainitiative.org ; Save the Children https://www.savethechildren.net/cote-d-Ivoire

[13] Save the Children Resource Hub https://resourcecentre.savethechildren.net/document/general-comment-no-16-2013-state-obligations-regarding-impact-business-childrens-rights/

while businesses have a responsibility to respect children's rights, it is the obligation of States to regulate and monitor private sector activities through appropriate laws, policies, and enforcement mechanisms.

It is also important to note that the Committee recently adopted General Comment No. 26 in 2023, which addresses children's rights and the environment, with a particular focus on climate change.[14] Although this report does not assess Côte d'Ivoire's implementation of GC26, its adoption signifies another area where children's rights intersect with business conduct and environmental impact.

Côte d'Ivoire ratified the Convention on the Rights of the Child (CRC), the African Charter on the Rights and Welfare of the Child (ACRWC), and ILO Conventions 182 and 138. The country has also enacted national laws prohibiting child trafficking and hazardous labour. However, challenges persist in the effective implementation of GC16, particularly in high-risk sectors such as agriculture, mining, and the informal economy.

While industry-led initiatives such as the Child Labour Monitoring and Remediation Systems (CLMRS) have sought to address child labour, corporate commitments to the broader GC16 principles remain limited. Many businesses tend to focus exclusively on child labour issues, neglecting other significant obligations such as ethical marketing, support for workers' parents, and ensuring accountability within the supply chain.

Beyond cocoa, Côte d'Ivoire's agricultural sector also relies heavily on child labour in the production of coffee, cotton, rubber, and palm oil. Many agribusinesses operate within informal structures, where children work long hours under exploitative conditions. These industries often lack comprehensive child protection policies, and business operations rarely incorporate child rights risk assessments, resulting in significant gaps in protection.[15]

In 2021, a study commissioned by Save the Children assessed Côte d'Ivoire's compliance with GC16 and identified several legal, institutional, and operational gaps. The findings indicated that although Côte d'Ivoire has ratified international child protection conventions, the country's legal framework lacks clear provisions requiring businesses to integrate child rights into their operations. Existing laws primarily focus on environmental protection and corporate social responsibility (CSR), rather than establishing robust mechanisms for enforcing child rights. Furthermore, many businesses remain largely unaware of GC16, with most corporate policies addressing only child labour issues while overlooking broader obligations related to supply chains, workplace protections, and ethical business practices.[16]

The 2021 study highlighted deficiencies in government oversight, particularly regarding the enforcement of legal protections for children. Regulatory agencies encounter challenges due to limited financial and human resources, which hampers their ability to ensure that businesses comply with child rights obligations. Furthermore, there is a significant lack of coordination among government bodies, private sector stakeholders, and CSOs, which further undermines enforcement and monitoring efforts. Additionally, corporate resistance to enhancing child rights protections presents a considerable barrier, with many companies citing financial constraints and a lack of government incentives as reasons for their reluctance to integrate GC16 principles into their business models.[17]

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[14] See *https://www.ohchr.org/en/documents/general-comments-and-recommendations/crccgc26-general-comment-no-26-2023-childrens-rights#:~:text=In%20this%20general%20comment%2C%20the,environmental%20harm%20and%20climate%20change* .

[15] UNICEF (2019) Promoting the Rights of children in the Cocoa Producing Areas in Cote d'Ivoire https://open.unicef.org/sites/transparency/files/2020-06/Cote-d-Ivoire-TP5-2018.pdf

[16] Save the Children (2021) Level of Implementation of GC 16 in Ivory Coast. https://www.savethechildren.net/cote-d-Ivoire

[17] Ibid

Since the drafting of the 2021 report, new findings from KIIs with government officials, private sector representatives, and CSOs indicate some progress but also persistent challenges. Government efforts have included training initiatives led by the Ministry of Women, Family, and Children, as well as the designation of focal points in key ministries to oversee the integration of child rights into business practices. However, no significant legal reforms have been introduced to strengthen enforcement mechanisms or mandate corporate compliance with GC16.

The private sector has made notable progress, particularly in the cocoa industry, where companies have improved child labour monitoring systems. However, corporate awareness of GC16 remains limited, and most businesses continue to resist adopting broader child rights obligations beyond merely addressing child labour. CSOs have endeavoured to raise awareness and conduct advocacy campaigns, but limited funding and insufficient collaboration with the government continue to undermine their effectiveness.

Despite these efforts, several challenges remain. The absence of a robust legal enforcement mechanism means that businesses are not held accountable for failing to safeguard child rights. The informal sector remains largely unregulated, leaving millions of working children without legal protections. Moreover, businesses often perceive child rights obligations as an additional burden rather than a fundamental aspect of sustainable business practices.

This study aims to provide an updated assessment of Côte d'Ivoire's implementation of GC16, focusing on progress made since 2021, ongoing challenges, and areas requiring urgent intervention. By examining the alignment of Côte d'Ivoire's business sector with GC16, the study seeks to identify gaps and propose strategic solutions to strengthen child rights protections in business practices. Strengthening legal enforcement, enhancing corporate responsibility, and fostering multi-stakeholder collaboration will be essential for achieving sustainable progress in the protection of children's rights.

2. Legal and Policy Framework: Progress and Gaps

Côte d'Ivoire has ratified key international instruments aimed at protecting children's rights, including the UN CRC and its Optional Protocol on the Sale of Children, Child Prostitution, and Child Pornography. The country is also a signatory to the International Labour Organization (ILO) Conventions No. 138 and No. 182, which establish the minimum age for employment and prohibit the worst forms of child labour. While these commitments provide a foundation for child protection, their implementation concerning business operations remains weak, as national laws do not explicitly integrate GC16 into business governance and corporate accountability frameworks.

Current national legal instruments offer broad protections for children but fail to directly address the intersection between business activities and child rights. The Child Protection Law No. 2016-1111 prohibits the economic exploitation of children; however, it does not require businesses to conduct child rights risk assessments or report on their efforts to prevent child labour and other forms of exploitation. Instead, child protection concerns are indirectly addressed through regulations related to environmental sustainability, corporate governance, and labour protections. Additionally, the Mining Code (Law No. 2004-138) and the Environmental Code (Law No. 96-766) contain provisions associated with corporate responsibility and sustainability, yet they do not impose binding child-specific obligations on businesses operating in high-risk sectors such as mining and agriculture. Similarly, consumer protection laws (Law No. 2016-412 and Law No. 2016-410) focus on preventing fraud and unsafe products but do not require companies to prevent or mitigate adverse impacts on children (ILO, 2024). This fragmented approach results in significant gaps in the legal framework, allowing businesses to operate without clear obligations to integrate child rights protections into their operations.

Since the 2021 assessment of Côte d'Ivoire's compliance with GC16, there has been some progress in policy awareness and engagement. However, no significant legislative changes have been made to institutionalise child rights obligations within business regulations.

The Ministry of Women, Family, and Children (MFFE) has initiated capacity-building initiatives, including training programmes for government agencies, businesses, and CSOs, aimed at enhancing understanding of GC16 and the CRBP. Although these training programmes have facilitated dialogue between government stakeholders and private sector actors, they have not resulted in binding legal measures that mandate businesses to take direct action in safeguarding child rights.

A desk review of available sources and consultations with KIIs have revealed no evidence of ongoing discussions or progress regarding the development of a National Action Plan (NAP) on Business and Human Rights in Côte d'Ivoire. Furthermore, there is no indication that child rights considerations have been integrated into any related policy discussions. This lack of documented engagement and stakeholder awareness suggests that the country has not yet initiated structured efforts to align with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which advocate for national strategies to ensure corporate accountability for human rights violations.

One of the major gaps identified in Côte d'Ivoire's legal framework is the absence of mandatory child rights impact assessments for businesses. There is no evidence indicating that such assessments are legally required. Although the government has reviewed proposals to incorporate child rights considerations into Environmental and Social Impact Assessments (ESIAs), there is currently no legal obligation for companies to assess or mitigate their impact on children.

Weak enforcement mechanisms further undermine the effectiveness of existing legal frameworks. Government agencies lack the financial and human resources required to monitor compliance with child protection regulations[18]. Although laws prohibiting child labour and human trafficking are in place, enforcement is inconsistent, and penalties for violations are infrequently applied.[19] Additionally, the existence of numerous laws and the lack of harmonisation among them has resulted in fragmentation within the legal framework, further limiting coordination between relevant ministries and making it challenging to establish a unified approach to child rights in business governance.[20]

A key recommendation emerging from the validation workshop is the necessity for Côte d'Ivoire to develop a comprehensive and harmonised Children's Code. In contrast to countries such as Zambia, Côte d'Ivoire currently addresses child rights through a fragmented legal framework spread across multiple sectoral laws, including the Child Protection Law, Labour Code, Environmental Code, and Consumer Protection legislation. This piecemeal approach complicates efforts to ensure coherence, enforceability, and accountability, particularly regarding business-related impacts on children. Participants emphasised that a new Children's Code would present a timely opportunity to domesticate General Comment No. 16 within Côte d'Ivoire's civil legal system. As GC16 is not self-executing or legally binding, it must be explicitly incorporated into national law to carry normative weight. Embedding GC16 recommendations, including mandatory child rights impact assessments, corporate due diligence, and state oversight obligations, within a consolidated Children's Code would provide a legal foundation for aligning national efforts with international child rights standards. It would also facilitate the integration of the Children's Rights and Business Principles (CRBP) and broader child protection issues, thereby supporting a more consistent application of child rights across sectors and improving

[18] Save the Children (2021) Level of Implementation of GC 16 in Ivory Coast. https://www.savethechildren.net/cote-d-Ivoire
[19] ICI https://www.cocoainitiative.org/ ; Save the Children https://www.savethechildren.net/cote-d-Ivoire
[20] Save the Children (2021) Level of Implementation of GC 16 in Ivory Coast. https://www.savethechildren.net/cote-d-Ivoire

coordination between ministries. Advocacy for the adoption of such a Code has been identified as a strategic priority to strengthen child rights governance in Côte d'Ivoire.

3. Key Findings from the 2021Baseline Report

Despite Côte d'Ivoire's commitment to protecting children's rights, the implementation of GC16 faces significant challenges. The study conducted in 2021 identified various interrelated barriers, including institutional, financial, administrative, and awareness-related issues, which hinder the integration of GC16 into business governance and corporate accountability structures. KIIs conducted in 2025 reaffirmed these findings, highlighting ongoing gaps that remain unaddressed.

a. Lack of Awareness Stakeholder Engagement

One of the most fundamental challenges to the implementation of GC16 is the widespread lack of awareness among government officials, business leaders, and CSOs regarding their roles and responsibilities under GC16. The 2021 study revealed that outside of a small group of engaged stakeholders, knowledge of GC16 remains low, with many state actors unaware of how it applies to their respective mandates.

KIIs conducted confirmed that this issue largely persists with limited improvements in awareness levels across key sectors. A CSO representative remarked:

"Awareness remains a critical issue; most businesses do not understand that GC16 goes beyond child labour and encompasses broader corporate responsibilities to children."

Similarly, a government official acknowledged that

"Many ministries have limited knowledge of GC16, and without a clear understanding, implementation is almost impossible."

The 2021 study found that businesses, particularly in the cocoa sector, often focus exclusively on child labour issues, overlooking the broader obligations of GC16, including supply chain accountability, corporate governance, and child rights due diligence. KIIs with private sector representatives confirmed this gap, emphasising that businesses prioritise other international frameworks such as OECD guidelines and EU due diligence requirements, frequently neglecting GC16. One corporate respondent noted:

"Companies in Côte d'Ivoire are somewhat aware of children's rights in business, but most of the time, especially in the cocoa sector, they focus primarily on child labour. They are not considering the broader commitments under GC16, and they are missing key aspects."

Another respondent explained that businesses often rely on international human rights treaties rather than GC16, stating:

"When companies think about human rights, GC16 is not the first document that comes to mind. It's much more about OECD guidelines or the EU due diligence policies. GC16 simply isn't prioritised."

This lack of prioritisation has resulted in minimal integration of GC16 principles into corporate strategies. Businesses in Côte d'Ivoire tend to frame their child rights initiatives through a CSR lens, which means they focus on community investment rather than embedding child protection into their core operations. A private sector representative stated:

"We are supporting community-based facilities and investing in education, but this is more about community development than about fulfilling GC16 obligations."

This statement highlights a critical misunderstanding that child rights obligations under GC16 extend beyond CSR initiatives. Rather than merely funding schools or health centres, businesses should be implementing policies that safeguard children within their supply chains, employment practices, and corporate governance frameworks.

A CSO representative corroborated this misalignment, explaining:

"Companies often assume that investing in schools and education infrastructure is sufficient. But GC16 is about embedding child rights within business operations, not just about making donations."

For the general public, GC16 remains largely unknown, as no major awareness campaigns have been conducted to enhance understanding or promote accountability. Without strong public engagement, businesses experience minimal pressure to improve compliance, which allows violations of child rights to persist unchecked.

b. Institutional Ambiguity and Coordination Weaknesses

The 2021 study on the implementation of General Comment 16 (GC16) in Côte d'Ivoire identified institutional fragmentation as a significant barrier to progress. At that time, no single entity was responsible for coordinating the implementation of GC16, resulting in weak interministerial collaboration, limited engagement from the private sector, and ineffective policy enforcement. Additionally, the study revealed that Corporate Social Responsibility (CSR) initiatives were often conflated with obligations under GC16, which further contributed to businesses' confusion regarding their responsibilities towards children's rights.

Since the 2021 study, there has been notable progress, particularly with the appointment of GC16 Focal Points within government ministries and the establishment of a GC16 Steering Committee. However, challenges remain in ensuring that these initiatives lead to effective coordination mechanisms and enforceable policies.

KIIs conducted confirmed that, as a direct result of the 2021 study, GC16 Focal Points have now been designated within various ministries, to enhance institutional coordination and awareness.

"Since the end of 2024, focal points have been appointed in various ministries at the request of the Ministry of Women, Family, and Children (MFFE). As the MFFE focal point, I have participated in capacity-building workshops to enhance awareness and coordination."

Additionally, a GC16 Steering Committee was established under the leadership of the Child Protection Directorate, uniting key government agencies, civil society CSOs, and international organisations engaged in child rights and business governance. This committee developed an action plan that facilitated discussions with 10 key stakeholders to contribute to the implementation of GC16 in
Côte d'Ivoire.

However, while these institutional improvements represent progress, significant coordination challenges persist, limiting the effectiveness of GC16 integration across government agencies

and business operations.

The 2021 study found that the absence of formal interministerial coordination mechanisms has significantly hindered the implementation of GC16, as each ministry has operated in isolation, thereby reducing policy cohesion and enforcement capacity.

Although the appointment of GC16 Focal Points is commendable, challenges persist in ensuring that these focal points possess the necessary authority, resources, and technical expertise to effectively coordinate GC16 activities across ministries.

Key Informant Interview (KII) consultations highlighted that:

"The National Focal Point within the Ministry of Women, Family, and Children (MFFE) lacks the authority to enforce GC16 across other ministries, leading to ineffective implementation."

Another KII noted that while the GC16 Steering Committee exists, it lacks a formalised enforcement mechanism, stating:

"The Steering Committee has brought stakeholders together, but there is still no structured framework that translates these discussions into binding policies or corporate obligations."

This lack of enforcement mechanisms and cross-ministerial collaboration has resulted in a siloed approach, where efforts to implement GC16 are inconsistent and largely dependent on the priorities of individual ministries.

Insights from the validation workshop confirmed that the process of domesticating GC16 into national legislation is now officially underway. In addition to the designation of GC16 Focal Points and the formation of a Steering Committee, a national consultant has been engaged to conduct a comprehensive review of Côte d'Ivoire's legal and policy frameworks. This review focuses on assessing the extent to which GC16 and other relevant regional and international human rights obligations are integrated across all pertinent laws and regulatory instruments, not solely those specific to children. The objective is to identify legal and policy gaps and generate concrete recommendations to translate GC16 into a cohesive, enforceable legal framework applicable across sectors.

One of the central advocacy priorities that emerged from the validation workshop is the call for a comprehensive Children's Code, which would harmonise
Côte d'Ivoire's fragmented child protection laws and provide an opportunity to integrate GC16 and broader child rights and business concerns into a unified instrument. Participants also emphasised that stewardship for implementation should rest with the Ministry responsible for child rights protection to ensure state ownership, sustainability, and cross-sector accountability. The ultimate goal is to transition from aspirational dialogue to binding commitments by advocating for legal and policy reforms that domesticate GC16 into national law(s), make its application mandatory for both public and private actors, and ensure that such legislation is adequately financed and institutionally supported for effective enforcement.

c. Severe Resource Constraints

The 2021 study identified chronic resource constraints as a major barrier to the effective implementation of GC16 in Côte d'Ivoire. Government agencies and CSOs lacked the necessary financial, technical, and logistical resources to promote awareness, enforce regulations, and

engage with businesses. The study revealed that child rights initiatives related to business practices were largely dependent on donor funding, with no sustained government budget allocation to support long-term implementation efforts.

Findings from KIIs indicate that these challenges persist, with no meaningful improvements in funding, personnel capacity, or logistical support. Government respondents confirmed that no specific measures have been taken to strengthen funding or address logistical challenges for GC16 implementation. Officials acknowledged that there is no dedicated budget for GC16 activities within government structures, leaving initiatives reliant on short-term, project-based funding from international donors.

CSOs continue to struggle with resource mobilisation, with respondents confirming that no progress has been made in securing long-term funding for GC16-related initiatives. The Forum des ONG, a key player in GC16 advocacy, relies exclusively on project-based funding from Save the Children, without any independent funding streams to support ongoing implementation efforts. This heavy reliance on external support limits CSOs' ability to conduct long-term monitoring, advocacy, and engagement with businesses regarding GC16 compliance.

In addition to financial limitations, technical and logistical challenges remain significant obstacles. Government agencies responsible for enforcing child rights regulations continue to struggle with inadequate resources, including a shortage of vehicles for field inspections, limited IT infrastructure for tracking corporate compliance, and a lack of training materials tailored for businesses. Without the necessary tools, enforcement agencies are unable to conduct regular site visits, monitor child rights violations in business operations, or provide capacity-building programmes for companies and government officials.

Human resource shortages within government institutions and CSOs also hinder implementation efforts. Many government agencies lack personnel specifically trained on GC16, and even within institutions that do have some knowledge of GC16, staffing levels remain insufficient to ensure effective enforcement and oversight. The reliance on short-term training programmes instead of institutionalised capacity-building mechanisms has created a lack of continuity, with knowledge and expertise often lost when personnel are reassigned or leave their positions.

The absence of long-term financial and logistical planning means that even well-intentioned policies remain largely unenforceable. Without a sustained commitment to resourcing GC16 implementation, Côte d'Ivoire risks continued stagnation in its efforts to integrate child rights into business practices. Addressing these resource constraints requires increased government budget allocations, strengthened technical capacity, and long-term investment in institutional frameworks to ensure effective monitoring, enforcement, and business engagement on child rights.

d. Weak Business Accountability and Limited Corporate Responsibility for Child Rights

The 2021 study highlighted the lack of business accountability mechanisms as a significant gap in Côte d'Ivoire's implementation of GC16. Although businesses in the country adhere to various international human rights obligations, there are no national-level administrative, budgetary, or judicial mechanisms compelling them to assess, prevent, or mitigate their impact on children. In contrast to environmental regulations that require Environmental and Social Impact Assessments (ESIAs), companies are not legally obliged to conduct Child Rights Impact

Assessments (CRIAs) or to incorporate child protection policies into their corporate governance frameworks.

Findings from KIIs conducted in 2024 confirmed that businesses are neither mandated to report on child rights risks nor incentivised to integrate child protection into their operations. Many companies focus on complying with international trade regulations and human rights standards, such as OECD due diligence guidelines and the UN Guiding Principles on Business and Human Rights, rather than prioritising national child protection measures. This emphasis on global compliance limits the extent to which GC16 is integrated into corporate governance and supply chain management.

e. Limited Corporate Understanding of GC16 Compliance

Key informant interviews revealed that many companies in Côte d'Ivoire, particularly in the cocoa sector, believe they are already fulfilling their child rights obligations through existing international commitments. Consequently, they do not perceive the need to integrate national child rights requirements, such as GC16, into their internal policies and operations.

Large companies lack standalone child protection policies, as they do not consider their business operations to be directly involving children. Instead, their approach to child rights is indirect, often centred on supporting local cooperatives and farmer networks through Child Labour Monitoring and Remediation Systems (CLMRS). While CLMRS helps identify and address child labour within cocoa supply chains, it does not comprehensively address broader child rights risks, such as marketing practices, workplace policies, or supply chain due diligence.

Although CLMRS has enhanced data collection and intervention efforts regarding child labour, its scope remains limited, focusing only on agricultural cooperatives. Other business operations, such as transportation, distribution, and retail, remain unregulated in terms of child rights compliance.

f. Corporate Reluctance to Expand Child Rights Commitments

A recurring theme in KIIs was that many businesses believe they have sufficiently addressed child labour and are reluctant to expand their commitments to include broader child rights obligations. Companies often view additional child rights requirements as regulatory burdens that could increase operational costs and compliance expectations.

Furthermore, the government has increasingly relied on the private sector to fund social programmes and child protection initiatives, which has led to corporate reluctance to assume additional responsibilities.

For example, businesses in the cocoa sector are already expected to contribute to national health insurance schemes for farmers and support educational and social initiatives. Some companies have voluntarily provided short-term health insurance for farmers and supported community-based education programmes. However, these initiatives are typically framed as social investments rather than legal obligations and are not linked to a formal commitment to compliance with GC16.

g. Lack of Enforcement and Monitoring Mechanisms

The lack of enforcement mechanisms to ensure corporate compliance with GC16 represents a significant accountability gap. KIIs confirmed that there are no legal consequences for businesses that fail to adhere to GC16, and companies are not obligated to disclose child rights risks, conduct due diligence, or report on their policies regarding children's rights.

The lack of enforcement mechanisms to ensure corporate compliance with GC16 represents a significant accountability gap. KIIs confirmed that there are no legal consequences for businesses that fail to adhere to GC16, and companies are not obligated to disclose child rights risks, conduct due diligence, or report on their policies regarding children's rights.

Government officials acknowledged that no formal monitoring system is in place to track business compliance with GC16, rendering corporate engagement voluntary. In contrast to environmental regulations, which include penalties for violations, child rights protections remain non-enforceable, allowing businesses to disregard them without facing any repercussions.

In addition to the absence of sanctions, there are no incentives to encourage businesses to implement child protection measures. KIIs indicated that companies do not receive tax benefits, certifications, or regulatory advantages for incorporating child rights into their business models. Without financial or operational incentives, businesses perceive little direct benefit in enhancing their child rights commitments beyond addressing child labour remediation.

h. Challenges in Expanding Corporate Engagement Beyond Child Labour

A key issue raised in the KIIs is that businesses in high-risk industries, particularly the cocoa sector, feel overwhelmed by child labour regulations. Many companies contend that they have made significant investments in child labour remediation and do not see a need to expand their commitments to additional child rights obligations.

Private sector respondents indicated that companies are more inclined to take action when it aligns with their business interests, such as enhancing productivity or meeting international trade standards. However, there is resistance to regulatory measures that impose new financial or compliance burdens.

Some companies have also expressed concerns about government expectations for corporate funding of public services, including health insurance and social security for farmers. While a few companies have provided short-term health coverage for workers, many argue that these responsibilities should be managed by the state rather than imposed on businesses.

i. Weak Monitoring and Collection Systems

The 2021 study identified the absence of reliable data on business-related child rights violations as a major gap in Côte d'Ivoire's implementation of GC16. The country's Integrated System for Data Management on Child Protection (SIPE) does not include indicators to track corporate violations of child rights, making it impossible to measure progress, assess risks, or identify areas requiring targeted intervention.

KIIs conducted confirmed that no significant progress has been made in addressing this issue. Government officials acknowledged that SIPE remains inadequate for tracking corporate compliance with GC16, and there is still no centralized mechanism for monitoring businesses' impact on children. The lack of child-specific data weakens accountability efforts, as violations go untracked, limiting policy and enforcement responses.

KIIs revealed that both government institutions and businesses lack the capacity to collect and analyse data on child rights. Government agencies are constrained by a shortage of trained personnel and financial resources necessary for the development of standardised indicators. Meanwhile, businesses are not required to assess or disclose risks related to child rights. Although some companies have implemented child labour monitoring systems, these efforts do not encompass broader child rights issues, such as marketing ethics, supply chain due diligence, or workplace protections.

Without comprehensive monitoring and data collection, Côte d'Ivoire lacks the necessary tools to evaluate the implementation of GC16, enforce compliance, or introduce targeted legal reforms. KII's emphasised that, without measurable data, corporate accountability remains weak, allowing violations to go unaddressed.

4. Key Progress in CSO Advocacy Initiatives on GC16 Implementation

Since the 2021 study, CSOs in Côte d'Ivoire, primarily led by Save the Children through the SIDA grant, have been at the forefront of advocacy efforts aimed at enhancing the implementation of General Comment No. 16 (GC16). Their initiatives have focused on raising awareness, influencing policy reforms, and fostering collaboration among government, businesses, and other stakeholders. Although significant progress has been made, ongoing challenges related to enforcement, funding, and corporate engagement continue to impede further advancement.

One of the most significant achievements of CSO advocacy is the establishment of the GC16 Steering Committee, coordinated by the Child Protection Directorate of the Ministry of Women, Family, and Children (MFFE). This multi-stakeholder committee comprises Save the Children, the Forum des ONG, UNICEF-CI, Charité Vie, and the Association of Children and Young Workers of Côte d'Ivoire. The formation of this committee has facilitated structured discussions and engagement on child rights and business accountability. Moreover, as a result of sustained advocacy, GC16 Focal Points have now been appointed within key government ministries. These focal points are expected to enhance institutional coordination and promote the integration of child rights considerations into business policies. However, challenges persist, as these focal points often lack the necessary authority, technical expertise, and financial resources to effectively influence policy implementation.

CSOs have prioritised corporate awareness initiatives to encourage businesses to integrate the GC16 principles into their operations. Through targeted training sessions, Save the Children and its partners have engaged with companies to clarify the obligations that extend beyond mere compliance with child labour laws. In December 2022, the GC16 Steering Committee trained seventeen companies on how to incorporate GC16 into their corporate policies. A subsequent capacity-building workshop in June 2023 brought together thirty-six stakeholders, including government officials, businesses, and civil society representatives. A significant outcome of these training efforts has been the drafting of a National Action Plan (NAP) on GC16, which is currently awaiting government approval. However, corporate resistance remains a major challenge, as many businesses continue to view child rights as an extension of corporate social responsibility (CSR) rather than a core business obligation.

CSO advocacy has resulted in significant policy reforms, particularly in the revision of the Environmental Code, a milestone` achieved largely through the efforts of the Forum des ONG and its partners. Due to sustained lobbying, the revised Environmental Code, adopted in November 2023, explicitly incorporates child rights considerations into Environmental and Social Impact Assessments (ESIAs). This policy change is critical as it requires businesses to evaluate the impact of their operations on children, ensuring that child rights are integrated into broader corporate sustainability and environmental governance frameworks.

While this represents a positive advancement, the enforcement mechanisms to ensure business compliance remain weak, and no formal penalties have been established for non-compliance.

Despite these policy advances, CSOs continue to face structural and operational challenges that hinder their advocacy efforts. One of the most significant obstacles is the heavy reliance on project-based funding, particularly from international donors such as SIDA, which finances Save the Children's GC16 initiatives. Without sustained financial support from the government, many advocacy efforts remain limited in duration and dependent on external grants, restricting the long-term impact of CSO engagement. Additionally, slow government responsiveness has further delayed critical reforms. Although CSOs have successfully advocated for the drafting of a NAP on GC16, the plan has yet to be formally adopted, resulting in notable gaps in structured implementation.

Engaging the private sector presents a significant challenge. While some businesses, particularly in the cocoa industry, have improved their child labour monitoring systems, overall corporate commitments to child rights remain inadequate. Many companies do not recognise GC16 as a fundamental responsibility, often limiting their focus to compliance with international trade standards rather than actively integrating child rights protections into their policies. Furthermore, the lack of government incentives, such as tax benefits or certifications for companies that comply with GC16, further discourages businesses from prioritising child rights in their operations.

CSOs are committed to enhancing child rights protections in business practices and are currently focusing on advancing key priorities. These priorities include securing the government's formal adoption of the NAP on GC16, advocating for legal mandates that require businesses to conduct CRIAs, and expanding their engagement efforts beyond the cocoa industry to include other high-risk sectors such as mining, palm oil, and manufacturing. Furthermore, CSOs are working towards establishing stronger partnerships with government agencies to ensure that GC16 focal points are endowed with greater authority, resources, and enforcement capacity.

While significant progress has been made, particularly in policy discussions and corporate engagement, the overall enforcement of GC16 remains weak. CSOs have established a foundation for a more structured approach to integrating child rights into business practices. However, without stronger legal mandates, increased government support, and a shift in corporate mindset, much of this progress is at risk of stagnation. Moving forward, sustained advocacy, financial investment, and stricter enforcement mechanisms will be essential for achieving meaningful and lasting change in child rights protections within business operations in Côte d'Ivoire.

5. Concluding Remarks

Côte d'Ivoire has made notable strides in advancing the implementation of GC16, reflecting a growing commitment to integrating child rights into business practices. Since the 2021 study, key institutional reforms have enhanced coordination and engagement among government, CSOs, and the private sector. The appointment of GC16 focal points in key ministries and the establishment of a GC16 Steering Committee have provided a structured framework for addressing the intersection of child rights and business, marking an important step toward greater corporate accountability.

CSOs, particularly Save the Children through the SIDA grant, have played a pivotal role in raising awareness, influencing policy discussions, and strengthening multi-stakeholder collaboration. Their advocacy has led to significant policy advancements, including the revision of the Environmental Code in November 2023, which now requires Environmental and Social Impact Assessments (ESIAs) to incorporate child rights considerations. Additionally, the drafting of a NAP on GC16 presents a valuable opportunity to embed child rights protections within national business regulations. These achievements signal a growing

recognition of the need for businesses to proactively safeguard children's rights within their operations and supply chains.

While progress has been made, there remains a strong opportunity for further advancements. Strengthening legal and policy frameworks will be essential to ensure that CRIAs become a standard part of business due diligence. Establishing clear accountability mechanisms will encourage greater corporate compliance with GC16 principles, ensuring that child rights protections extend beyond voluntary commitments. Enhancing data collection systems will further support evidence-based policymaking and targeted interventions, enabling businesses and government agencies to track progress and measure impact effectively.

Corporate engagement with GC16 is increasing, particularly within the cocoa industry, where businesses have expanded child labour monitoring efforts. As awareness grows, there is a valuable opportunity to broaden corporate commitments beyond child labour to include ethical marketing, parental workforce support, and responsible supply chain management. Encouraging businesses to view child rights as an integral part of sustainable business practices rather than an isolated CSR activity will contribute to a more responsible and resilient private sector.

Sustaining momentum in GC16 implementation will require collaborative efforts from government, businesses, civil society, and international partners. Continued investment in capacity-building, policy advocacy, and financial support for child rights initiatives will ensure that progress remains steady and impactful. By reinforcing legal enforcement mechanisms, incentivizing corporate responsibility, and fostering deeper multi-stakeholder collaboration, Côte d'Ivoire is well-positioned to become a regional leader in integrating child rights into business governance.

With these promising developments in mind, the next section outlines targeted recommendations for key stakeholders, detailing actionable steps to further strengthen child rights protections and corporate accountability in Côte d'Ivoire.

6. Recommendations

a. Recommendations for the Government

i. *Strengthening the Legal and Institutional Framework*

- Develop and adopt a comprehensive and unified Children's Code that harmonises all child rights legislation and formally integrates the obligations of General Comment No. 16 into national law. The Code should establish binding requirements for businesses to respect and uphold children's rights while clearly defining the State's obligations to regulate, monitor, and enforce corporate accountability for impacts on child rights. It should align domestic law with international standards, creating a cohesive legal framework that strengthens child protection, promotes effective access to remedies, and ensures that both State and private actors are held accountable for respecting children's rights.

- Revise national legislation to require Child Rights Impact Assessments (CRIAs) for businesses, ensuring that all companies evaluate and address their impact on children.

- Adopt and implement the National Action Plan (NAP) on GC16, integrating child rights protections into all business-related policies, plans, and programmes.

- Ensure that businesses include child rights protections in licensing and registration requirements, with clear criteria for assessing child rights risks.

ii. ***Enhancing Enforcement and Corporate Accountability***

- Establish legal penalties for non-compliance with child rights obligations, ensuring that corporate violations result in sanctions, fines, or operational restrictions.
- Mandate corporate reporting on child rights compliance, requiring businesses to publicly disclose the measures they are taking to mitigate child rights risks.
- Create an independent oversight body to monitor business compliance with GC16, with the authority to conduct inspections, audits, and enforcement actions.

iii. ***Institutional Coordination and Multi-Stakeholder Engagement***

- Enhance collaboration between CIMPE, CNS, and other national child protection bodies, ensuring a cohesive approach to the implementation of GC16.
- Empower GC16 Focal Points in government ministries by providing financial, technical, and human resources to enable them to effectively fulfil their mandates.
- Improve synergy in GC16 implementation efforts, ensuring that initiatives are aligned with national and international child protection frameworks to avoid duplication.

iv. ***Strengthening Data Collection and Monitoring***

- Integrate child rights indicators into the national data system (SIPE), ensuring that business-related child rights violations are systematically recorded.
- Develop a business compliance index to evaluate corporate adherence to GC16, facilitating comparative analysis and targeted interventions.

v. ***Incentivising Corporate Compliance***

- Offer tax incentives for businesses that integrate child rights protections into their corporate structures, encouraging proactive compliance with GC16.
- Implement public recognition programmes for businesses that demonstrate leadership in child rights protections, motivating others to follow their example.

b. Recommendations for the Private Sector

i. ***Embedding Child Rights into Business Policies and Operations***

- Integrate GC16 principles into corporate policies and codes of conduct, ensuring businesses create child-friendly work environments, ethical marketing practices, and supportive policies for parents in the workforce.

- Implement mandatory Child Rights Impact Assessments (CRIAs) for all businesses, incorporating these assessments into corporate due diligence and sustainability frameworks.

- Extend child protection policies beyond corporate headquarters, ensuring that subsidiaries, supply chains, and informal business partners adhere to GC16 principles.

- Strengthening Private Sector Monitoring and Accountability Establish internal compliance mechanisms, including child protection officers within companies, to monitor adherence to GC16.

- Create industry-wide certification programmes to recognise companies that incorporate child rights protections into their business models, thereby promoting responsible corporate behaviour.

- Develop grievance and remediation mechanisms, allowing workers, parents, and affected communities to report child rights violations in business operations.

ii. ***Capacity Building and International Engagement***

- Enhance corporate understanding of GC16 through targeted training programmes, ensuring businesses are aware of their obligations beyond simple child labour compliance.

- Engage in regional and international forums on child rights and business, ensuring that Côte d'Ivoire aligns its corporate accountability frameworks with global best practices.

- Engage with CSOs and government partners to develop public-private partnerships that support community-based child protection programs.

iii. ***Promoting Transparency and Ethical Business Practices***

- Commit to public disclosure of child rights policies and impacts, publishing reports on how business operations affect children and the steps taken to mitigate harm.

- Align business practices with international frameworks, including the UN Guiding Principles on Business and Human Rights, OECD Due Diligence Guidelines, and ILO Conventions on Child Labor.

- Integrate child rights considerations into corporate social responsibility (CSR) initiatives, ensuring that corporate programs support systemic child rights protections rather than short-term philanthropic efforts.

c. Recommendations for CSOs

i. Advocacy and Policy Engagement

- Advocate for the development and adoption of a comprehensive and unified Children's Code that incorporates General Comment No. 16 and the Children's Rights and Business Principles (CRBP) into national legislation. Civil society should play a pivotal role in promoting the harmonisation of existing child protection laws, ensuring that the Code establishes both binding business obligations and clearly defined State responsibilities to

regulate, monitor, and enforce child rights protections across all sectors. CSOs should also advocate for robust financing provisions and enhanced institutional capacity to support implementation and accountability.

- Push for legal mandates that require businesses to conduct Child Rights Impact Assessments (CRIAs) and publicly disclose their efforts to comply with child rights standards.

- Strengthen advocacy efforts targeting high-risk industries such as agriculture, mining, and informal labour sectors, ensuring that companies operating in these areas incorporate GC16 principles into their policies.

ii. ***Capacity Building and Public Awareness***

- Expand training programmes for government officials, businesses, and local communities on GC16, highlighting the importance of corporate accountability in child rights protection.

- Raise awareness at the grassroots level to ensure that workers, parents, and local authorities understand children's rights in the business sector and the available legal remedies.
- Empower community-based organisations to monitor and report on child rights violations, thus enhancing local-level accountability.

iii. ***Strengthening Monitoring and Collaboration***

- Partner with the government to improve data collection on child rights, enabling civil society to contribute to the monitoring of business-related violations.

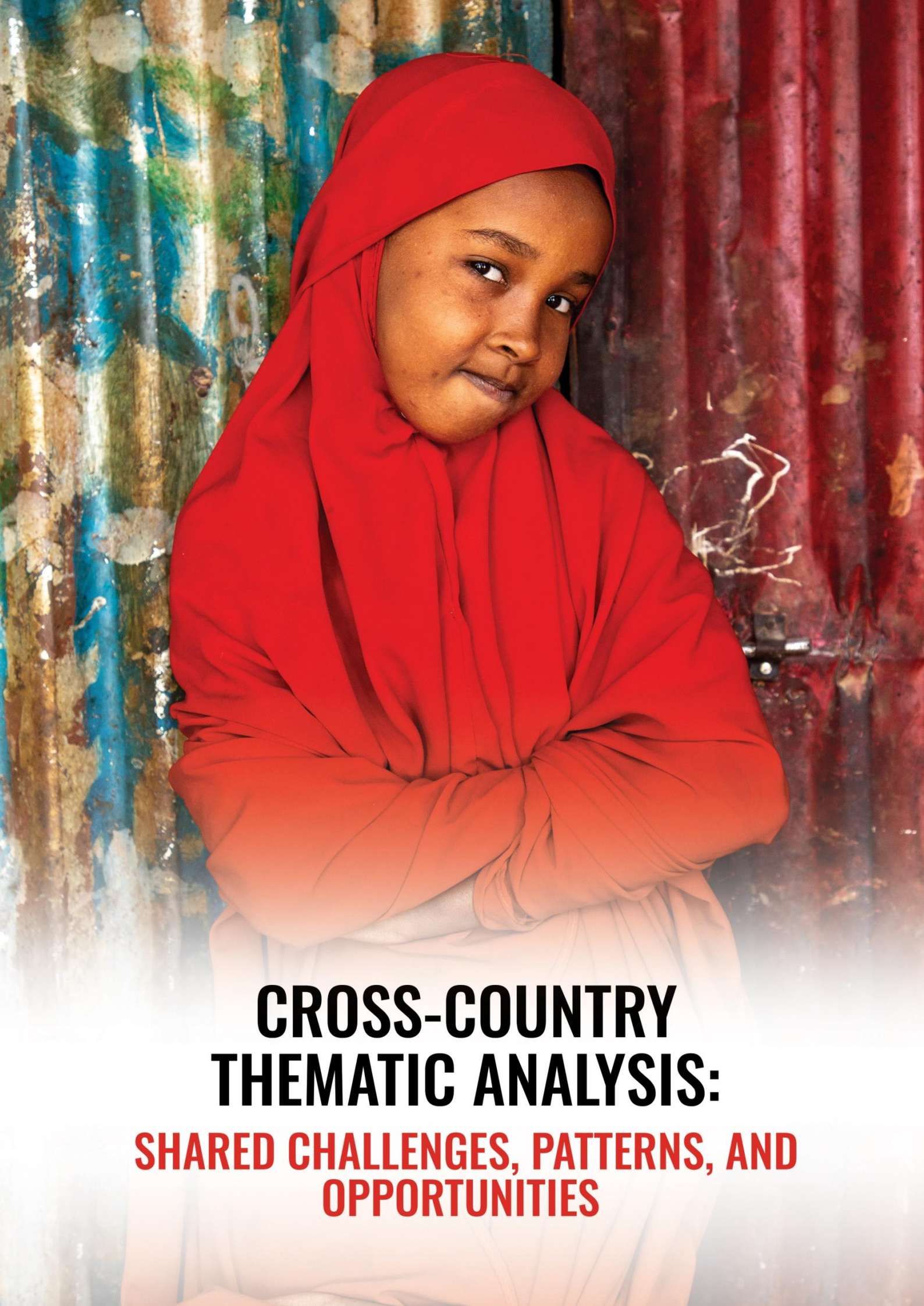
- Collaborate closely with businesses to develop sector-specific guidelines on child rights compliance, promoting private sector commitment to GC16 principles.

- Increase collaboration between CSOs , business associations and trade unions to advocate for improved workplace conditions that support working parents and prevent child exploitation.

iv. ***Ensuring Financial Sustainability for Child Rights Programmes***

- Advocate for increased government funding to support long-term child protection programmes rather than relying solely on donor-based funding models.

- Establish multi-stakeholder funding mechanisms, where businesses contribute to child rights initiatives through corporate responsibility programmes, taxation schemes, or public-private partnerships.



CROSS-COUNTRY THEMATIC ANALYSIS:

SHARED CHALLENGES, PATTERNS, AND OPPORTUNITIES

The three country assessments, while differing in scope encompassing Ethiopia's review of the garment sector, Côte d'Ivoire's implementation of GC16, and Zambia's broader analysis of business and child rights, they identify several recurring themes. Despite variations in geography, sectoral focus, and legal frameworks, the reports reveal overlapping concerns and challenges that influence children's interactions with business environments. This section outlines key cross-cutting themes to inform policy development, programming, advocacy, and regional engagement related to child rights and business.

1. Fragmented Legal and Policy Frameworks

A common concern among Ethiopia, Côte d'Ivoire, and Zambia is the fragmented and incomplete nature of the legal and policy frameworks governing the intersection of business and children's rights. Although all three countries have ratified key international instruments, including the UN Convention on the Rights of the Child (CRC), the African Charter on the Rights and Welfare of the Child (ACRWC), and ILO Conventions 138 and 182, these commitments have yet to be fully incorporated into enforceable, business-oriented legislation.

National laws typically address child protection in sector-specific manners, with provisions dispersed across frameworks related to labour, education, environment, and consumer protection. Zambia distinguishes itself by adopting a unified Children's Code in 2022, which offers a consolidated legal foundation for child protection and participation. However, this code has yet to establish binding corporate obligations or mandate businesses to conduct child rights due diligence. In Côte d'Ivoire and Ethiopia, the lack of a comparable code has led to legal fragmentation, resulting in inconsistent addressing of business responsibilities towards children, which are often confined to the issue of child labour.

More broadly, the primary legal focus continues to be on regulating child labour, while other aspects of children's rights in business including ethical advertising, digital harms, family-supportive workplace policies, and environmental safety remain largely unregulated. Some incremental progress is evident. Zambia has enacted new legislation, including the Zambia Institute of Marketing Act (2022) and the Competition and Consumer Protection (Amendment) Act (2023), which establish ethical standards for marketing. However, these laws do not specifically safeguard children from targeted or harmful content. In Côte d'Ivoire, the Environmental Code was revised in 2023 to incorporate child rights within Environmental and Social Impact Assessments (ESIAs); nonetheless, these reforms remain isolated and are not integrated into a broader regulatory transformation.

Adding to this challenge is the disparity between national legal frameworks and international business compliance standards. In Ethiopia, for instance, while national law permits employment from the age of 15, international brand requirements often stipulate a minimum hiring age of 18. Consequently, adolescents aged 15–17 are excluded from formal employment opportunities and are compelled to seek informal, often exploitative work. This issue is further exacerbated by the lack of a legal minimum wage in Ethiopia, which contributes to economic vulnerability, particularly among young workers.

There is currently no evidence of formal legal harmonisation or coordination among the three countries, despite their shared value chains and overlapping sectoral risks. The absence of alignment with RECs or African Union frameworks constitutes a missed opportunity for regional consistency and cross-border accountability.

2. Limited Child Rights and Business Awareness Across All Sectors

In all three countries, awareness of the CRBP and GC16 remains limited. While child labour is widely recognised as a significant business risk, there is considerably less understanding of the broader responsibilities that businesses have in areas such as ethical marketing, family-friendly workplace policies, and child rights due diligence.

To date, CRBP has primarily been advocated by a select group of child-focused organisations, notably Save the Children and UNICEF, with minimal engagement from non-child-focused civil society organisations, business associations, or governmental institutions. Consequently, the agenda has not been fully integrated into broader human rights, labour, or development frameworks.

This gap is exacerbated by the donor-dependent nature of most child rights and business initiatives. In the absence of legal mandates or public funding, awareness efforts tend to be short-term and project-based, leading to fragmentation and diminished impact. Without enhanced institutional support, the scaling and sustainability of awareness-raising efforts is unlikely, especially among new or less specialised stakeholders.

Despite these challenges, promising initiatives are emerging. In Zambia and Côte d'Ivoire, CSOs have conducted training for businesses, engaged in treaty reporting, and created platforms for child-led media and advocacy. In Ethiopia, engagement within industrial parks has provided a valuable entry point for raising awareness regarding business accountability and child rights. These efforts have facilitated collaboration among garment industry businesses, young workers, and CSOs focused on workplace and social protections. This approach presents a promising model that could be scaled to other industrial parks in Ethiopia and replicated in countries with expanding manufacturing sectors.

To build on this progress, countries must institutionalise child rights and business training across various sectors, integrate it into public policy frameworks, and invest in the capacity of local CSO beyond individual projects. Expanding the circle of engaged stakeholders and ensuring that children are included as active participants is essential for making corporate accountability for children's rights both visible and actionable.

3. Voluntary Compliance and Business Culture: Progress and Limits

In Zambia, Ethiopia, and Côte d'Ivoire, business engagement with child rights has primarily manifested as voluntary action rather than adherence to binding obligations. Although this approach has facilitated some positive developments, it remains inconsistent, reactive, and inadequately institutionalised across various sectors.

Businesses in all three countries frequently equate support for children's rights with CSR such as funding schools, supporting community programmes, or participating in industry-led child labour monitoring systems. While these initiatives are valuable, they are often ad hoc, driven by donor projects, or confined to sectors under international scrutiny (such as cocoa in Côte d'Ivoire or apparel in Ethiopia). Crucially, these efforts seldom encompass broader issues like family-friendly workplace policies, ethical marketing, or child rights due diligence across entire supply chains.

Nonetheless, there are instances of significant progress. In Ethiopia, several garment factories often in collaboration with civil society organisations have implemented on-site childcare, improved maternity leave, and established grievance mechanisms to address workplace issues. In Zambia, multiple firms have adopted internal child protection policies, and business associations are starting to engage with CRBP principles, particularly following targeted training. In Côte d'Ivoire, the cocoa sector has enhanced child labour remediation systems through the expansion of Child Labour Monitoring and Remediation Systems (CLMRS), although the broader integration of GC16 remains limited.

Despite these advances, voluntarism continues to characterise the prevailing business culture. Many companies, particularly in high-risk sectors, view child rights as a philanthropic add-on rather than a core compliance issue. In Côte d'Ivoire, certain cocoa companies have expressed concern that they are already overburdened by their contributions in taxes, participation in CSR initiatives, and responses to donor and buyer demands. As a result, they are increasingly resistant to adopting new obligations. Furthermore, government expectations for businesses to address social protection gaps have strained goodwill, with firms contending that service delivery is ultimately the responsibility of the State.

The absence of structured incentives exacerbates the issue. In all three countries, businesses that take the lead on children's rights seldom receive tangible benefits, such as tax incentives, preferential procurement, public recognition, or certification schemes. Without these mechanisms in place, responsible business conduct is perceived as costly and optional rather than competitive and expected.

Moving forward, governments and development partners can assume a catalytic role in transforming this culture. In addition to legal reform, they can establish reward structures that promote best practices, such as business scorecards, public recognition platforms, and procurement incentives. Furthermore, incorporating CRBP into business membership codes or sustainability standards could help normalise expectations across sectors. By progressively shifting the norm from voluntarism to accountability while acknowledging and scaling the progress already achieved stakeholders can cultivate a business environment in which child rights are integral to how companies define responsible and sustainable success.

4. Weak Enforcement and Monitoring Mechanisms

One of the most enduring barriers to advancing child rights in business across Zambia, Ethiopia, and Côte d'Ivoire is the limited effectiveness of enforcement systems and the lack of robust, coordinated mechanisms to monitor corporate compliance. Even where legislation exists such as prohibitions on child labour or mandates for workplace inspections implementation is frequently hindered by inadequate resources, fragmented mandates, and institutional gaps.

Labour inspection systems across the three countries are significantly under-resourced and primarily concentrate on formal businesses, thereby leaving informal sectors such as agriculture, mining, domestic work, and home-based garment production outside the purview of regular oversight. In Côte d'Ivoire and Ethiopia, regulatory agencies encounter financial and technical constraints, and penalties for non-compliance are infrequently enforced. Although Zambia has made strides through collaborations with civil society, inspections continue to prioritise visible or traditionally monitored issues, such as child labour, with insufficient attention given to marketing practices, parental workforce policies, or emerging digital risks.

Monitoring is further weakened by the lack of reliable, child-focused data. For instance, Côte d'Ivoire's child protection database (SIPE) does not track business-related violations, while Ethiopia and Zambia have no dedicated systems for monitoring or analysing corporate impact on children. As a result, enforcement agencies lack the evidence base needed to address systemic risks or inform targeted interventions.

These gaps are exacerbated by inconsistent enforcement across sectors. Industries subject to international scrutiny—such as cocoa in Côte d'Ivoire or apparel in Ethiopia—tend to receive greater oversight due to external compliance requirements. Conversely, domestically oriented and informal sectors, where many children are at the highest risk, are frequently neglected, leading to fragmented protection and accountability.

In the absence of mandatory due diligence or third-party audits, many companies rely on internal CSR units or sector-specific reporting processes to monitor their impacts related to children. These self-assessments often vary in quality and lack external verification or benchmarking, which limits their credibility and scalability.

Importantly, the mechanisms for involving children and communities in enforcement are underdeveloped. While all three countries have national policies that support child participation, none have integrated these principles into business-related compliance structures. There is limited opportunity for children to voice concerns regarding harmful marketing, workplace risks, or environmental hazards associated with corporate activities. Furthermore, accessible and child-friendly grievance and remediation channels. Children and affected workers often lack clear and safe pathways to raise concerns or seek redress.

Despite these challenges, encouraging efforts are emerging. Côte d'Ivoire's revised Environmental Code now mandates that Environmental and Social Impact Assessments (ESIAs) take child rights into account. In Ethiopia, monitoring has been enhanced in certain factories through partnerships with civil society organisations and worker associations. In Zambia, civil society has commenced testing child rights and business monitoring tools that show potential for broader application.

Going forward, substantial progress will rely on sustained investment in regulatory capacity, encompassing labour inspectorates, child protection agencies, and business oversight authorities. Enhanced inter-agency collaboration is essential to harmonise roles, pool resources, and address regulatory gaps. Sector-specific tools and indicators can assist in tailoring enforcement to the varied risks children encounter across different industries. Finally, the establishment of child-sensitive data systems and the institutionalisation of feedback mechanisms from children and communities will ensure more responsive and accountable corporate regulation systems.

By integrating these practices into child protection and business oversight frameworks, all three countries can transition from reactive, ad hoc responses to a more strategic and proactive model of enforcement one that prioritises children at the centre of business accountability.

5. Limited Multi-Stakeholder Coordination

Efforts to promote child rights within the business sector in Zambia, Ethiopia, and Côte d'Ivoire continue to be impeded by the absence of institutionalised, cross-sector coordination. While there are promising initiatives, they tend to be project-based, fragmented, or short-lived, and lack effective mechanisms for joint planning, data sharing, and sustained collaboration.

In Côte d'Ivoire, the establishment of a GC16 Steering Committee and the designation of focal points within relevant ministries represent significant strides toward inter-institutional coordination. However, these structures currently lack formal mandates, dedicated funding, and integration into broader national policy frameworks, which restricts their influence and sustainability. Similarly, in Zambia, there has been an increase in civil society organisation (CSO) engagement with private sector actors; however, there is no national platform specifically dedicated to advancing the Child Rights and Business Principles (CRBP), and child rights have not yet been incorporated into the country's Business and Human Rights Action Plan processes.

In Ethiopia, coordination is primarily limited to donor-driven initiatives focused on a select number of industrial parks. Although these forums provide valuable opportunities for collaboration among businesses, CSOs, and local authorities, they lack integration within a national strategy and are not underpinned by government-led mechanisms to guarantee long-term adoption and scalability.

Across all three contexts, existing coordination efforts are often siloed ither sector-specific (e.g., cocoa, garment) or driven by isolated stakeholders with few formal avenues for sustained engagement among child protection bodies, labour authorities, business regulators, and community-based actors. Furthermore, the participation of children and affected communities is rarely institutionalised within these coordination frameworks.

Duplication of efforts is a significant concern. In both Zambia and Ethiopia, for instance, various actors such as CSOs, donors, and international agencies may independently engage the same businesses, often without coordinated messaging or harmonised expectations. This fragmentation can undermine credibility, create confusion, and diminish business buy-in.

Despite these gaps, there is significant potential to capitalise on existing momentum. Multi-stakeholder structures, such as sectoral working groups, industrial park councils, and CSO-business forums, provide promising entry points. These should be formally linked to national policy and budget processes, with clearly defined mandates, predictable resourcing, and joint accountability mechanisms.

Institutionalising multi-stakeholder coordination will necessitate the integration of CRBP and GC16 into national development strategies, business regulations, and child protection frameworks. This process also involves ensuring that child rights considerations are mainstreamed across ministries not limited to child-focused departments and that businesses are systematically recognised as both duty bearers and partners in child protection.

Ultimately, sustainable progress will depend on the establishment of enduring, cross-sector platforms that unite state, private, and civil society actors around a shared child rights agenda, recognising children themselves as active stakeholders in shaping the business practices that impact their lives.

6. Insufficient Child and Community Participation

While all three countries have legal frameworks supporting child participation, children's voices remain largely absent from business and human rights discussions. Conversations regarding labour rights, workplace safety, and corporate conduct seldom incorporate the perspectives of children or the communities most affected by corporate practices.

Participation in national development planning is more pronounced in areas such as education, health, and child protection. However, in the context of shaping labour policy, supply chain standards, or industrial compliance, children and youth are frequently regarded as beneficiaries rather than as rights-holders with a voice. This creates a significant gap in accountability and overlooks an opportunity to ensure that corporate interventions are more closely aligned with lived experiences.

There are, however, encouraging signs. In Zambia, CSOs have pioneered child-led media campaigns and treaty reporting submissions, demonstrating that children can meaningfully engage in public advocacy on child rights and business. These initiatives not only amplify children's concerns but also provide them with a platform to question harmful business practices and propose alternative solutions. Similarly, Ethiopia's garment sector has witnessed the emergence of worker associations and youth engagement within industrial parks, offering a practical entry point for involving young workers in discussions on corporate responsibility and labour rights.

Across all three countries, communities most directly affected by harmful business practices including caregivers, local leaders, and informal workers are also underrepresented in regulatory and policy

dialogues. Their participation is largely confined to consultations rather than ongoing involvement in oversight, monitoring, or remediation processes.

Moving forward, participation must extend beyond symbolic engagement. Embedding the voices of children and communities within national CRBP platforms, grievance mechanisms, and corporate compliance reviews will be essential for building legitimacy, trust, and responsiveness. Strengthening child- and youth-led spaces, investing in civic education on business accountability, and equipping local actors with the tools to monitor and report violations will help ensure that rights are upheld not merely in theory, but in practice.

7. The Informal Sector – A Major Blind Spot

The informal economy is not only a significant driver of child labour but also constitutes the majority of economic activity in all three countries studied. In Zambia, over 90% of the workforce is engaged in informal employment. In Côte d'Ivoire, informal agriculture, particularly in cocoa, coffee, and palm oil, dominates rural livelihoods. In Ethiopia, the collapse of formal garment manufacturing following the country's suspension from AGOA has driven thousands of young workers, particularly women, into informal, home-based garment production. Despite its scale and importance, the informal sector remains largely unregulated and outside the reach of child rights protections or corporate accountability frameworks.

Children working in informal sectors frequently endure severe conditions, including long hours, exposure to hazardous environments, and limited access to education. However, monitoring and enforcement mechanisms seldom reach these areas. Informal enterprises are not subject to labour standards or CRBP principles, and there are few CRBP programmes or advocacy strategies specifically designed for these contexts. Notably, both Zambia and Ethiopia advocate for targeted interventions aimed at informal businesses. Zambia emphasises the need for social protections such as access to childcare, parental leave, and rights for informal workers to mitigate child labour. In the post-AGOA context, Ethiopia illustrates how informal subcontracting and home-based production can rapidly increase when formal employment declines, thereby heightening risks for young workers. This transition presents a compelling case for outreach strategies that address the circumstances of informal work while simultaneously fostering corporate accountability and state oversight.

Importantly, organisations such as the African Child Policy Forum (ACPF) are currently conducting research into the intersection of the informal sector and child rights across the continent. This initiative is expected to provide essential evidence and policy recommendations to stimulate regional action and influence both legal reform and programme design. It highlights a growing recognition that child protection systems must evolve to reflect economic realities, rather than solely formal legal structures. The informal economy possesses a significant cross-border dimension. Informal trade, migratory labour, and transnational value chains—particularly in agriculture, domestic work and artisanal mining often entail the movement of children across jurisdictions where national protections may not be applicable. These gaps underscore the urgent necessity for a harmonised regional approach. Coordination among African Union bodies and RECs could facilitate the standardisation of child rights safeguards, promote shared data systems, and establish cross-border frameworks for monitoring, protection, and remediation.

Protecting children in informal economies necessitates the application of child rights and corporate accountability frameworks beyond formal businesses to the informal sector, where the highest risks remain. This requires the recognition of informal workers within legal frameworks, the provision of social protection for families involved in precarious livelihoods, and collaboration with local networks to monitor risks in areas where state oversight is insufficient. Without this shift, a significant number of children affected by business practices will remain invisible and unprotected.

INTEGRATING CHILD RIGHTS INTO AFRICA'S ECONOMIC GOVERNANCE.

THE ROLE OF THE AFRICAN UNION (AU) AND REGIONAL ECONOMIC COMMUNITIES (RECS)

1. Introduction

From National Gaps to Regional Leverage

Africa's flagship policy frameworks, Agenda 2063 and Vision 2030, aim to achieve inclusive growth, industrial transformation, and sustainable development. However, the protection of children's rights remains inadequate within this vision, particularly in relation to business practices. Exploitative labour, weak regulatory enforcement, and corporate impunity continue to undermine the rights and wellbeing of millions of African children.

As documented in the national reports from Zambia, Ethiopia, and Côte d'Ivoire, business-related harms to children often transcend borders and sectors. Many of the identified gaps, ranging from the informal economy to voluntary compliance cultures and limited corporate accountability, require systemic solutions that extend beyond the capabilities of any single country. The African Union Commission (AUC) and Regional Economic Communities (RECs) play an integral role in shaping policies that govern economic activities. These bodies can drive corporate accountability, ensuring that business operations align with child protection frameworks while promoting sustainable economic empowerment across Africa's regions.

This chapter examines how continental and regional bodies, including the AUC, the African Committee of Experts on the Rights and Welfare of the Child (ACERWC), and RECs, can help address these shared challenges. Additionally, it considers the emerging role of the African Commission on Human and Peoples' Rights (ACHPR) and the African Court on Human and Peoples' Rights (African Court), which have begun to establish precedents regarding the accountability of non-state actors—including corporations—for human rights violations.

Drawing on the cross-cutting themes emerging from the three country studies, the ACERWC's 2023 study on children's rights and business in Africa, and recent efforts by the AU human rights architecture to strengthen corporate accountability, this chapter explores how Africa's regional mechanisms can better protect children from business-related harms and promote child-sensitive economic governance. It also highlights how CSOs can leverage these institutions for advocacy, policy influence, and multi-level engagement, creating a loop between local realities and regional reform.

2. The Role of Regional Bodies in Advancing Child Rights in Business

a. The African Union Commission

The African Union Commission (AUC) plays a pivotal role in shaping the continent's economic integration agenda, particularly through frameworks such as Agenda 2063 and the African Continental Free Trade Area (AfCFTA). While traditionally focused on economic growth and regional trade, these instruments have significant implications for children, particularly in terms of their influence on labour markets, migration flows, and dynamics within the informal sector.

The AfCFTA, which aims to establish a unified market for goods and services across Africa, currently lacks explicit safeguards pertaining to child rights, including issues of child labour, exploitation, and protection within cross-border trade..[21] This omission has raised concerns among child rights advocates, as increased trade without sufficient protections may exacerbate vulnerabilities among children, particularly in sectors such as agriculture and mining. [22]

[21] Plan International (2024) https://plan-international.org/au/publications/african-continental-free-trade-area-implications-cross-border-issues-affecting-children/
[22] Ibid

Research by organisations such as Plan International highlights the risk that, without corrective policy measures, the implementation of the AfCFTA could contribute to child trafficking, commercial sexual exploitation, and economic displacement.[23] Concurrently, the AfCFTA presents a valuable opportunity; through its review mechanisms—such as Article 28 —it provides a pathway for integrating child protection clauses in future revisions.

In parallel, the African Union Commission (AUC) has developed a Draft Policy Framework on Business and Human Rights, which encourages member states to align with the United Nations Guiding Principles on Business and Human Rights (UNGPs). Although the framework does not explicitly address children's rights, it establishes a foundational approach to promoting broader corporate accountability and responsible business conduct across the continent.[24] As implementation progresses, this framework has the potential to incorporate more robust protections for children within the governance of business operations, trade, and investment.

The AUC plays a crucial role in convening and coordinating efforts across African Union institutions, including the ACERWC, ACHPR, and the African Court. The AUC is well-positioned to enhance policy coherence between economic agendas and child rights initiatives. Furthermore, it can assist member states and RECs in integrating child rights into trade and investment frameworks and in developing practical tools, such as Regional Child Rights Impact Assessments, to guide national and regional implementation.

For the AU to make a meaningful contribution to the protection of children in business contexts, its institutions must transition from high-level frameworks to operational mechanisms that facilitate enforcement, monitoring, and accountability. Coordinated action with child rights institutions, such as the ACERWC, human rights mechanisms like the ACHPRs, and partnerships with civil society will be essential to this shift.

Ultimately, the AUC is strategically positioned to ensure that Africa's economic ambitions are aligned with the protection and promotion of children's rights. By fostering a stronger alignment between trade, governance, and child protection agendas, the AUC can contribute to establishing a more inclusive and equitable future for the continent's youngest citizens.

b. Regional Economic Communities (RECs)

Regional Economic Communities (RECs) including the Economic Community of West African States (ECOWAS), the East African Community (EAC), the Common Market for Eastern and Southern Africa (COMESA), the Intergovernmental Authority on Development (IGAD), and the Southern African Development Community (SADC) play a pivotal role in shaping Africa's economic and social policy landscape. While their mandates centre on regional integration and economic cooperation, RECs increasingly influence normative frameworks relating to human rights, including the protection of children in business contexts.

ECOWAS has demonstrated notable leadership through its Child Policy and Strategic Plan of Action (2019–2030), which provides a comprehensive framework for promoting children's rights across the region.[25] It encompasses child protection, education, health, and participation, and specifically calls for

[23] Ibid

[24] Covington & Burling LLP (2024) African forum on business and human rights: Here's what companies need to know. Available at: https://www.cov.com/-/media/files/corporate/publications/2024/01/african-forum-on-business-and-human-rights-heres-what-companies-need-to-know.pdf

[25] ECOWAS Child Policy (2019 - 2030) https://ecowas.int/wp-content/uploads/2022/03/ECOWAS-CHILD-POLICY-ENG-CON-Printed.pdf

harmonised legal approaches to combat child labour and trafficking. Importantly, it urges the integration of child rights into broader social and economic development strategies, although references to corporate accountability remain general.

The EAC, through its Child Policy, provides a regional mechanism for aligning national child protection frameworks. The policy outlines core priorities, including child survival, development, protection, and participation, and underscores the importance of legal harmonisation. The EAC has also conducted legal reviews to align national laws with international child rights instruments, facilitating further engagement on child rights and business.[26]

COMESA has made significant progress in harmonising child labour laws across its member states, promoting consistent legal standards that ensure businesses operating within the region uphold basic protections for children. These efforts aim to enhance regulatory coherence and improve institutional capacity for enforcement, particularly by aligning national laws with international labour standards.[27] However, while the harmonisation agenda effectively addresses child labour, broader aspects of corporate responsibility such as marketing practices, product safety, and due diligence remain underdeveloped.

COMESA's most significant regulatory engagement with business conduct is outlined in its Competition Regulations. Article 27 of these regulations prohibits suppliers from making false or misleading representations to consumers and mandates compliance with both COMESA and national consumer protection laws.[28] The COMESA Competition Commission has emphasised that businesses must act responsibly when marketing to children, recognising their vulnerability as consumers. It discourages exploitative advertising strategies that take advantage of children's inexperience or emotional responses, such as unsubstantiated claims about product benefits or messaging that induces feelings of inferiority in children who do not purchase a product.
These measures represent a significant recognition of children's rights in commercial contexts.

However, the region still lacks a comprehensive framework for incorporating child rights into corporate accountability structures. Issues such as mandatory child rights impact assessments, safe product standards, and child participation in consumer protection oversight remain insufficiently explored. Strengthening these areas presents a distinct opportunity for COMESA to enhance its leadership in fostering a child-sensitive business environment.

IGAD, through its Regional Child Policy Framework, adopts a conflict- and climate-sensitive approach to child protection. It focuses on survival, development, safety, and participation, particularly for children affected by insecurity and displacement. The policy's emphasis on child-sensitive governance across sectors creates an opportunity for integrating children's rights into economic development and business accountability efforts, especially in fragile contexts.[29]

SADC has taken a significant step forward with its Revised Code of Conduct on Child Labour (2022). Aligned with international standards such as the ILO Conventions 138 and 182, as well as the ACRWC, this Code outlines guiding principles and actions for member states, focusing on legal enforcement, education, and the roles of employers and trade unions.[30] While it highlights monitoring and evaluation

[26] See The EAC Child Policy (2016) at *https://faolex.fao.org/docs/pdf/mul214449.pdf*

[27] See COMESA HIV and AIDS Policy at *https://www.comesa.int/wp-content/uploads/2020/05/ENG_COMESA-HIV-and-AIDS-Policy.pdf*

[28] See COMESA Consumer Protection Magazine, 2024 Edition at *https://www.comesacompetition.org/wp-content/uploads/2024/08/consumer-magazine-2024-edition-english.pdf*

[29] See IGAD Communiqué Ministers in Charge of Children Affairs Endorse the IGAD Child Policy Framework **https://igad.int/ministers-in-charge-of-children-affairs-endorse-the-igad-child-policy-framework**

[30] See SADC Code of Conduct on Child Labour (Revised): Accelerating Action to Eradicate Child Labour in SADC https://www.sadc.int/sites/default/files/2022-10/EN-%20Revised_SADC_Code_on_Child_Labour_30%20March%202022.pdf

mechanisms, the Code would benefit from stronger connections to corporate due diligence, remediation, and ethical supply chain practices.

Despite these encouraging developments, corporate accountability for child rights remains inconsistently addressed across REC instruments. Most frameworks primarily concentrate on child labour, with limited attention given to broader business impacts such as unsafe products, exploitative marketing, or the role of digital platforms. To address these gaps, RECs should consider adopting regionally standardised CRIA protocols, integrating ethical business standards into trade and investment agreements, and developing cross-border monitoring and certification systems.

CSOs play a critical role in this space. By engaging in REC policy dialogues, submitting parallel reports, and forming regional coalitions, CSOs can help ensure that children's rights are not sidelined in economic development plans. Their advocacy is especially vital in holding businesses accountable where state enforcement is weak or fragmented.

While RECs provide essential platforms for the integration of child rights, there is a growing need to explicitly incorporate corporate responsibility and child rights into regional economic governance. Strengthening these frameworks will help ensure that economic progress not only avoids harm to children but also actively supports their development and protection.

c. The African Committee of Experts on the Rights and Welfare of the Child (ACERWC)

The ACERWC plays a pivotal role in establishing normative standards and promoting child rights throughout the continent, including within the context of business operations. Established under the ACRWC, the Committee has progressively broadened its focus to encompass corporate accountability, acknowledging that business activities directly impact the realisation or violation of children's rights.

Agenda 2040, the Committee's flagship framework, sets forth ten aspirations for Africa's children, with Aspiration 7 specifically advocating for the eradication of violence, exploitation, and harmful labour practices. It urges states to adopt and implement policies and regulations that ensure businesses incorporate child rights into their operations, supply chains, and sustainability efforts. While the Agenda is aspirational in nature, it is supported by an expanding array of operational tools developed by the ACERWC to mitigate business-related risks to children.

One of the most critical interventions is the Committee's 2023 Study on Children's Rights and Business, which provides a continent-wide analysis of the intersection between corporate activity and child welfare. The study emphasises that businesses must progress beyond merely "doing no harm" to proactively contributing to children's well-being. It recommends the elimination of child labour, the assurance of safe and ethical marketing, support for decent work for caregivers, and the production of child-safe goods and services. The report also acknowledges the African Union and Regional Economic Communities (RECs) as key actors in promoting legal harmonisation, monitoring frameworks, and peer accountability regarding child rights and business.

The Committee's work is further enhanced by its Working Group on Children's Rights and Business, which was established in 2020 to strengthen the Committee's engagement with corporate

accountability issues. This Working Group has led several landmark resolutions, each addressing a specific aspect of children's rights:

- **Resolution 17/22 on children's rights in the digital sphere** urges private technology companies and ICT providers to prevent online sexual exploitation, ensure ethical advertising, and avoid harmful content targeting children.

- **Resolution 20/24 on the AfCFTA** calls on Member States to integrate a child rights-based approach into trade agreements, including the utilisation of Child Rights Impact Assessments (CRIAs) in trade policy planning and monitoring.

- **Resolution 21/24 on informal business** regulation highlights the vulnerability of children in unregulated sectors and calls for targeted reforms to safeguard them from exploitation.

The Committee routinely addresses business-related issues through its concluding observations on state reports. In recent reviews of Kenya and South Africa, the ACERWC recommended the enhancement of labour inspections, the development of National Action Plans on Business and Human Rights, and the implementation of corporate due diligence frameworks that incorporate children's rights. The Committee's General Comment on Article 27 of the ACRWC, which focuses on sexual exploitation, also addresses the role of businesses, particularly in the ICT, hospitality, and advertising sectors, in both preventing and contributing to abuse. It provides concrete guidance for states and companies on fulfilling their responsibilities to protect children from commercial exploitation.

Notably, the ACERWC has commenced linking its advocacy with continental economic frameworks, participating in and presenting at forums such as the African Business and Human Rights Forum and the regional dialogues on National Action Plans in Southern Africa. This cross-institutional engagement has contributed to elevating the profile of children's rights within broader discussions on business and human rights.

Furthermore, the Committee has taken measures to integrate climate and environmental risks into its business agenda. Recognising the growing displacement of children due to climate shocks, the ACERWC has urged businesses, particularly those in extractive and high-emission sectors, to adopt sustainable practices that do not exacerbate child vulnerability. This initiative builds on discussions held during the 2023 Day of General Discussion on climate change and children's rights.

The strength of the ACERWC lies in its collaborative approach, which includes partnerships with National Human Rights Institutions (NHRIs), AU treaty bodies such as the ACHPR and the African Court, as well as RECs, to advocate for regional legal harmonisation and cross-border enforcement. However, enforcement and follow-up mechanisms are still insufficient, and the implementation varies significantly among member states.

In this context, CSOs play a crucial role. CSOs can support the ACERWC by submitting alternative reports on business-related harms to children, monitoring the implementation of resolutions, and participating in treaty body sessions. They can also amplify the voices of children and communities through national dialogues and cross-border campaigns. Importantly, the Committee encourages the participation of children themselves, as outlined in its Guidelines on Child Participation, to ensure that their lived experiences inform corporate policy and regulatory responses.

The ACERWC provides a distinctive platform to promote corporate accountability for children's rights at both national and regional levels. Its resolutions, studies, treaty monitoring, and working groups offer an expanding toolkit for governments, businesses, and CSOs aiming to incorporate child

protection into Africa's economic and business governance. The forthcoming challenge is to convert these norms and frameworks into actionable commitments—bolstered by sufficient resources, cross-sector collaboration, and robust enforcement—to ensure that no child is excluded from Africa's development agenda.

d. The African Commission on Human and Peoples' Rights (ACHPR)

The ACHPR plays a crucial role in promoting and safeguarding human rights across the continent, particularly within the domains of business and economic governance. Although its primary focus is not exclusively on children's rights, the ACHPR has made significant strides in addressing the human rights implications of corporate activities, particularly through its Working Group on Extractive Industries, Environment and Human Rights Violations (WGEI), its jurisprudence, and its normative guidance to states.

Established in 2009, the WGEI serves as the principal regional mechanism for enhancing responses to human rights concerns in the extractive sectors. The group has produced several key instruments relevant to children's rights and business, including:

- **The 2012 Resolution on a Human Rights-Based Approach to Natural Resource Governance**, which urges states to uphold transparency, ensure fair compensation, and protect vulnerable communities affected by extractive industries, including children.[31]
- **The Niamey Declaration (2017),** which encourages AU member states to implement human rights, environmental, and safety standards in artisanal mining, and to adopt legislation that safeguards the rights of vulnerable groups such as children, women, and indigenous peoples.[32]
- **The 2021 Resolution on Extractive Industries and Indigenous Land Rights** reaffirms the necessity of obtaining free, prior, and informed consent, particularly concerning decisions that affect vulnerable communities.[33]
- **The 2023 Resolution on Business and Human Rights in Africa,** which calls for the establishment of a binding African instrument on corporate human rights obligations. It also urges the integration of human rights considerations into the AfCFTA and Blue Economy strategies, with particular emphasis on the protection of vulnerable groups, including children.[34]

The State Reporting Guidelines on Articles 21 and 24 of the ACHPR further emphasise the necessity of safeguarding women and children from business-related harm. These guidelines advocate for the incorporation of specific health, safety, and environmental standards in extractive zones, as well as the conduct of human rights and environmental impact assessments.[35] Additionally, they call for the active involvement of vulnerable groups, including women and children, as well as their representatives, in decision-making processes.

In terms of jurisprudence, the ACHPR has set important precedents:

In **SERAC v. Nigeria**[36], the Commission determined that Nigeria bore responsibility for failing to safeguard communities from environmental damage inflicted by oil companies. Although the violations were not explicitly centred on children, the consequences—such as contaminated water, loss of

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[31] See Resolution on a Human Rights-Based Approach to Natural Resources Governance - ACHPR/Res.224(LI)2012 *https://achpr.au.int/en/adopted-resolutions/224-resolution-human-rights-based-approach-natural-resources-governance*

[32] See Resolution on the Niamey Declaration on Ensuring the Upholding of the African Charter in the Extractive Industries Sector - ACHPR/Res.367(LX)2017 https://achpr.au.int/en/adopted-resolutions/367-resolution-niamey-declaration-ensuring-upholding-african-ch

[33] See Resolution on Extractive Industries and the Protection of Land Rights of Indigenous Populations/Communities in Africa - ACHPR/Res. 490 (LXIX)2021 *https://achpr.au.int/en/adopted-resolutions/490-resolution-extractive-industries-and-protection-land-rights-indigen*

[34] See Resolution on Business and Human Rights in Africa - ACHPR/Res.550 (LXXIV) 2023*https://achpr.au.int/en/adopted-resolutions/550-resolution-business-and-human-rights-africa-achp*

[35] See *https://achpr.au.int/sites/default/files/files/2021-05/statereportingguidelinesandprinciplesonarticles21and24eng.pdf*

[36] See SERAC & Another v Nigeria (2001) AHRLR 60 (ACHPR 2001) or Communication No. 155/96.

livelihoods, and destruction of ecosystems—had significant implications for children's survival, health, and education.

In **IHRDA v. Democratic Republic of Congo**,[37] The Commission condemned both state and corporate complicity in the 2004 Kilwa massacre, ordering reparations and emphasising the liability of a foreign mining company for facilitating human rights abuses.

These rulings demonstrate the Commission's recognition of business-related human rights harms and establish legal avenues for future cases specifically addressing issues concerning children.

Beyond decisions and declarations, the ACHPR has actively conducted promotional missions in South Africa, Uganda, Zambia, and Eswatini, where it gathered information on corporate abuses in the extractive sectors. It has also issued letters to companies such as Anvil Mining, requesting acknowledgement of wrongdoing and contributions to reparations.

The Commission is currently finalising a Background Study on Extractive Industries and Human Rights and a Monitoring Tool for tracking violations, which may enhance oversight of corporate conduct impacting children. Furthermore, the WGEI is involved in the development of an African Common Position on the UN Treaty on Business and Human Rights, advocating for an instrument that prioritises vulnerable populations.

However, despite these advances, key gaps and opportunities remain for enhanced child-focused engagement:

- Although the Commission has not yet issued a General Comment specifically addressing business and children's rights, a joint interpretative guidance with the ACERWC could serve to clarify state obligations and promote consistency in the integration of child protection into corporate legal and policy frameworks.

- Children's voices are rarely represented in ACHPR processes. Currently, there is minimal child and youth participation in state reporting, communications, or public hearings. This risks overlooking the lived experiences of children affected by corporate abuse, particularly in informal sectors, mining communities, and environmental crises.

- Although the communications procedure serves as an accessible mechanism for CSOs to file complaints regarding rights violations, including those stemming from corporate activities, there are few cases that explicitly address children as a distinct group. Strengthening partnerships with the ACERWC, which possesses expertise in child rights, and collaborating with CSOs to support child-sensitive complaints could help address this gap.

To address these challenges, the ACHPR could consider strengthening its collaboration with the African Committee of Experts on the Rights and Welfare of the Child (ACERWC), particularly through the ACERWC Working Group on Child Rights and Business, to develop joint guidance or peer review tools. This would enhance consistency in state obligations and foster a unified regional approach to protecting children in business contexts. The Commission could also fortify its periodic review process by encouraging child-sensitive state reporting, including the integration of Children's Rights and Business (CRB) indicators into its state reporting guidelines. Additionally, to improve accessibility and

[37] a See Communication 393/10–IHRDA and Others v. Democratic Republic of Congo.

engagement, the ACHPR could support the development of child-friendly summaries of its communications and guidelines. These resources would empower civil society organisations and child-led groups to better understand and utilise the Commission's mechanisms. Finally, the ACHPR might explore the creation of youth advisory or observer roles within its working groups, particularly those dealing with sectors where children are at heightened risk of exploitation, such as extractives, agriculture, and informal trade.

CSOs play a vital role in advancing the child rights and business agenda within the ACHPR. They can submit communications to address business-related violations of children's rights, including those linked to extractive industries and corporate complicity in abuse. Through shadow reports, CSOs can influence the Commission's state reviews by highlighting regulatory gaps and enforcement failures.

CSOs also support the development of normative guidance, such as General Comments, by contributing technical input during consultative processes. Their engagement with the Working Group on Extractive Industries (WGEI) helps shape studies, field missions, and monitoring tools related to business impacts on children. Additionally, by working with national human rights institutions, CSOs can promote child and youth participation in the ACHPR's processes, ensuring that children's voices are reflected in regional human rights governance.

Although the Commission does not yet have formal mechanisms for child participation, it can assume a bridging role by submitting child-led evidence, supporting legal capacity building for youth groups, and amplifying the voices of children affected by business-related harm. CSOs are also crucial in mobilising public awareness, urging states to implement ACHPR decisions, and ensuring that victims—including child victims—receive reparations.

Looking ahead, the ACHPR can enhance its relevance to child rights and business by formalising partnerships with the ACERWC, developing joint guidance on vulnerable groups in business contexts, and ensuring that future jurisprudence, impact assessments, and policy tools incorporate child-specific safeguards.

e. The African Court on Human and Peoples' Rights

The African Court on Human and Peoples' Rights has begun to shape precedent on corporate accountability in the context of human rights. In the 2023 case Ligue Ivoirienne des Droits de l'Homme (LIDHO) v. Côte d'Ivoire,[38] The Court addressed, for the first time, the responsibility of multinational corporations, holding the state accountable for failing to regulate harmful corporate practices. The ruling emphasised the state's duty to protect communities from business-related harm and called for legal reforms, environmental safeguards, and compensation for affected populations.

Although children were not explicitly referenced in the decision, the nature of the violations, including environmental degradation, displacement, and loss of livelihoods, undoubtedly impacted them. The Court's recognition of vulnerable communities and the need for rights-based, sustainable development creates a critical opportunity for advancing child rights within business and human rights jurisprudence.

[38] See LIDHO and Others v Republic of Cote d'Ivoire (Application 041/2016) [2023] AfCHPR 21 (5 September 2023)

CSOs can leverage this evolving jurisprudence to advocate for stronger protections against business-related child rights violations. While direct access to the Court remains restricted, only a few AU member states permit NGO standing. CSOs can engage by submitting communications in partnership with affected individuals or filing amicus curiae briefs. They can also support implementation by monitoring compliance with judgments and promoting child-sensitive litigation strategies.

f. Bridging Regional Commitments and Ground-Level Realities

Across Africa's institutional landscape, a growing array of regional mechanisms, policy frameworks, and jurisprudence reflects the understanding that business activities must respect and promote children's rights. From the African Union Commission's economic instruments to the ACERWC's normative guidance and the ACHPR's legal oversight, the continent is gradually assembling the necessary tools to address the business-related harms faced by children. However, as the following section will explore, many of the most pressing challenges—including informal labour, environmental degradation, and cross-border exploitation—persist at the ground level. Drawing on evidence from the ACERWC's 2023 study, the next section examines how these structural risks continue to impact children and underscores the urgent need for stronger alignment between regional ambitions and local realities.

3. Business and Child Rights: Key Challenges in Africa

Child rights in Africa present both opportunities and challenges in ensuring that economic growth benefits all members of society, particularly children. While businesses are essential for driving economic development and job creation, there is an ongoing need to strengthen child rights protections, especially in high-risk industries, informal employment, and migration-driven labour markets.

The ACERWC identifies key areas for improvement across the continent. These include enhancing safeguards in agriculture, mining, fisheries, and construction; increasing corporate accountability; addressing the impacts of climate change on children's well-being; and harmonising policies to create a more effective child protection framework.

These efforts are particularly crucial in the informal economy, where targeted interventions and stronger regulations can help uphold children's rights, reduce vulnerabilities, and foster a more inclusive and sustainable economic landscape.

The ACERWC highlights that a significant portion of child labour in Africa occurs outside the formal economy, with 99% of working children aged 10-14 in Sub-Saharan Africa employed in the informal sector, primarily in agriculture. Even among older children aged 15 to 17, who are legally permitted to work in non-hazardous jobs, informal employment remains prevalent, with only 1% engaged in formal work. The transition to formal employment typically begins only after the age of 18, underscoring the prolonged vulnerability of young workers in informal settings. Migrant children and informal workers are among the most at risk, often lacking legal protections, access to education, and corporate accountability factors that perpetuate a cycle of poverty and labour exploitation.

One of the most concerning aspects of child labour is the increasing trend of cross-border exploitation. Many children migrate across borders in search of work or are trafficked into forced labour and sexual exploitation. The ACERWC report reveals that children from economically vulnerable regions, particularly those affected by climate change and displacement, are often recruited with false promises of employment and education, only to find themselves trapped in exploitative labour conditions. The lack of coordinated legal protections between countries enables traffickers to operate with impunity, exploiting weaknesses in migration policies and child protection laws.

Child trafficking is particularly prevalent in agricultural regions, where children are transported across borders to work on plantations and commercial farms under hazardous conditions. In West Africa, children from Burkina Faso and Mali are frequently trafficked into Côte d'Ivoire to labour on cocoa plantations. Many endure long hours of physically demanding work, deprived of education and healthcare, while earning little to no wages. The ACERWC highlights that these exploitative practices are facilitated by the lack of effective cross-border monitoring mechanisms, making it challenging to track and rescue trafficked children. The situation is similarly dire in the fishing industry, particularly in Ghana's Lake Volta region, where trafficked children are forced to work under extreme conditions. Boys as young as five are made to dive into deep waters to untangle fishing nets, a dangerous task that has resulted in multiple drownings. Girls, on the other hand, are often subjected to domestic servitude or coerced into commercial sexual exploitation as a means of economic survival. The ACERWC emphasises that these industries are marked by a lack of law enforcement and regulatory oversight, which allows these abuses to continue.

Beyond trafficking, economic migration among children remains a widespread issue, particularly in urban centres where informal employment opportunities attract vulnerable children. Many children who migrate in search of work ultimately find themselves in highly exploitative sectors such as domestic labour and street vending. The ACERWC notes that in cities such as Lagos, Dakar, and Nairobi, thousands of children work long hours in hazardous environments, often exposed to abuse and exploitation. Street vendors, many of
whom are under 14, sell goods in heavy traffic or crowded markets, where they face a constant risk of accidents, harassment, and economic exploitation by adult vendors. Domestic work, predominantly occupied by young girls, is another significant area of concern. Many girls are brought from rural villages with the promise of education or employment, but end up in households where they serve as domestic workers under abusive conditions. Their isolation within private homes makes it nearly impossible to monitor their well-being or ensure they receive wages for their labour. The ACERWC highlights that child domestic workers frequently experience physical and emotional abuse, sexual exploitation, and denial of basic rights such as education and healthcare.

Migration and trafficking expose children to significant vulnerabilities, while high-risk industries such as agriculture, mining, and fisheries perpetuate child labour as an economic necessity for many families. Agriculture stands as Africa's largest employer of child labour, with over 70% of working children engaged in farming. The ACERWC underscores that children in agriculture face severe risks, including exposure to pesticides, harsh weather conditions, and physically demanding tasks that can lead to long-term health issues. Frequently, these children are involved in work that directly disrupts their education, thereby reinforcing cycles of poverty across generations. In regions such as Rwanda's tea plantations and Egypt's cotton farms, children often work alongside their parents due to the absence of affordable childcare services. They endure challenging working conditions with little or no protective equipment, leaving them susceptible to chronic health problems, such as respiratory issues and malnutrition.

The fishing industry poses significant risks for child labour exploitation, particularly in coastal and lake regions where fishing serves as a primary source of income. Children are often required to work on boats, clean fish, or engage in processing activities without appropriate safety measures. The ACERWC notes that in Senegal, Tanzania, and Ghana, children in fishing communities face perilous conditions that jeopardise their physical and emotional well-being. Many are deprived of educational opportunities and are compelled to take on labour-intensive roles that support their families' economic survival. Despite international efforts to combat child labour in fisheries, enforcement remains weak, allowing businesses to profit from child labour without facing accountability.

Mining is another sector where child labour is prevalent, often under particularly hazardous conditions. In the Democratic Republic of Congo, artisanal mining operations heavily depend on child labour to extract

valuable minerals such as cobalt and gold. These children work in deep, poorly ventilated tunnels and are exposed to toxic chemicals that lead to serious health complications. The ACERWC highlights that the lack of government oversight in these mining regions has allowed businesses to exploit child labour with impunity, often under the guise of family-run enterprises. Similarly, in Côte d'Ivoire, children are involved in artisanal mining operations, handling dangerous tools, carrying heavy loads, and working in extreme heat without safety measures. The informal nature of the mining industry complicates the enforcement of labour laws, permitting children to remain trapped in exploitative conditions.

Furthermore, climate change has emerged as a significant driver of child labour and displacement. The ACERWC emphasises that extreme weather events such as droughts, floods, and cyclones are forcing families to migrate in search of economic opportunities, thereby increasing the number of children entering hazardous labour markets. In regions affected by deforestation and environmental degradation, families reliant on agriculture and fishing are struggling to sustain their livelihoods, pushing children into exploitative work to compensate for lost income. Air pollution in urban centres such as Lagos and Johannesburg has also raised health concerns among children, particularly respiratory illnesses that hinder their ability to attend school and engage in social activities. Meanwhile, water pollution from mining operations in the DRC and Zambia continues to expose children to mercury poisoning, further jeopardising their long-term development.

The ACERWC report highlights the urgent need for systemic reforms to address the widespread violations of child rights in business contexts. A key intervention is the strengthening of corporate accountability. Businesses should be mandated to conduct Child Rights Impact Assessments (CRIAs) and ensure that their supply chains are free from child labour. Companies must also be held accountable for their contributions to environmental degradation, ensuring that industrial activities do not exacerbate the vulnerabilities of children. The report advocates for stronger legal frameworks that extend protections to informal workers, particularly migrant children and those engaged in domestic work. Additionally, governments must pursue regional cooperation to tackle cross-border trafficking, ensuring that trafficked children are identified and protected through legal mechanisms that support their recovery and reintegration.

As the ACERWC warns, without urgent reforms, Africa's economic development will continue to rely on the exploitation of its most vulnerable children. To break this cycle, governments need to expand legal protections, businesses must incorporate child rights into their operational frameworks, and society as a whole must prioritise the well-being of children over short-term economic gains. Only through coordinated action can Africa progress towards an economic model that safeguards the dignity and rights of its youngest citizens.

4. Policy Recommendations for Regional Action

Addressing the complex challenges surrounding child rights and business in Africa requires a coordinated regional approach that leverages the advocacy of CSOs, the oversight of treaty bodies, and the economic influence of Regional Economic Communities (RECs). The ACERWC underscores the need for collective accountability frameworks that compel businesses to uphold child rights while strengthening regional mechanisms to monitor compliance, facilitate enforcement, and drive policy reform.

a. Strengthening Treaty Body Mechanisms for Business Accountability

The ACERWC and the UN Committee on the Rights of the Child (CRC) play a critical role in monitoring state compliance with obligations related to children's rights. However, inconsistent reporting, a lack of CRB-specific indicators, and limited cross-border cooperation undermine their ability to enforce protections for children's rights in business operations.

To enhance business accountability in child rights governance, the following measures are recommended:

- ***Incorporating CRB-Specific Indicators:*** Treaty bodies must integrate CRB-specific indicators into state reporting frameworks, ensuring that corporate practices affecting children are systematically assessed.
- ***Harmonising Treaty Body Reporting Mechanisms:*** Aligning reporting requirements between the ACERWC and the CRC Committee will help prevent duplication and create a cohesive system for monitoring corporate compliance with child rights obligations.
- ***Enhancing Peer Review Processes:*** African states should evaluate one another's progress on CRB principles through peer review mechanisms, fostering policy alignment, regional collaboration, and shared accountability.
- ***Expanding Treaty Body Engagement with RECs:*** Treaty bodies must work closely with RECs such as ECOWAS, SADC, and COMESA to embed child rights protections into regional economic governance frameworks.

By reinforcing the capacity of treaty bodies, improving reporting mechanisms, and enhancing regional collaboration, African states can strengthen corporate accountability and ensure that business operations respect children's rights.

b. Enhancing the Role of Regional CSO Coalitions in Advocacy and Accountability

Regional CSO coalitions, particularly the African Children's CSO Coalition, play a crucial role in advocating for child-centred economic policies. By engaging with the ACERWC, RECs, and the African Union (AU), these coalitions ensure that corporate practices and state policies prioritise children's rights.

To maximise their impact, the following strategies are recommended:

- ***Deepening Engagement with Treaty Bodies:*** CSOs must strengthen collaboration with the ACERWC by submitting alternative reports and policy recommendations that accurately reflect the realities of child labour and corporate accountability.

- ***Advocating for Stronger CRB Policies at RECs:*** CSOs should advocate for the integration of child rights protections into regional trade and investment agreements, ensuring that businesses operating across borders uphold ethical labour standards.

- ***Raising Awareness of Cross-Border Child Exploitation:*** Given the growing trend of child trafficking and labour migration, regional CSOs must coordinate advocacy campaigns that highlight the vulnerabilities of migrant children and advocate for stronger cross-border legal protections.

- ***Building Capacity for Grassroots Advocacy:*** Strengthening the capacity of local CSOs through training, technical assistance, and financial support will empower communities to monitor business practices, engage in treaty body reporting, and hold governments accountable.

By expanding CSO engagement in regional governance, increasing their influence in economic policy forums, and raising awareness of cross-border child rights violations, CSOs can drive systemic reforms that protect Africa's most vulnerable children.

c. Regional Collaboration to Align Business Practices with Agenda 2063

Africa's Agenda 2063 envisions a prosperous, inclusive, and sustainable future, but achieving this goal requires embedding child rights protections into economic governance structures. Many industries implicated in child labour, such as mining, agriculture, and manufacturing, operate across multiple African countries, making regional collaboration essential for harmonising labour protections and corporate accountability measures.

- ***Embedding CRB Standards into Regional Trade Agreements:*** Agreements under frameworks like the AfCFTA must incorporate child rights safeguards, ensuring that businesses adhere to ethical labour standards.
- ***Developing Cross-Border Monitoring Systems:*** Establishing harmonised labour inspection protocols, regional databases, and tracking systems will enable improved oversight of corporate supply chains and child labour violations.
- ***Integrating CRB Principles into National Development Plans:*** African states should include child rights impact assessments in their economic policies, ensuring that corporate activities do not undermine child welfare.

By aligning CRB principles with Agenda 2063, Africa can achieve sustainable economic growth while safeguarding children's rights.

d. Strengthening Data Collection and Evidence-Based Policy-Making

Despite efforts to monitor corporate compliance with child rights, many African governments lack disaggregated, child rights-specific data to track progress and inform policies. Strengthening data collection and monitoring systems will ensure that child rights violations in business are systematically documented and addressed.

- ***Developing National Child Rights Data Collection Systems:*** Governments and businesses should establish standardised tracking mechanisms for child labour, migration trends, and corporate violations.
- ***Creating a Regional Child Rights Monitoring Tool:*** The ACERWC and civil society organisations (CSOs) should harmonise child rights data collection across Africa, thereby improving evidence-based policy coordination.
- ***Mandating Corporate Transparency:*** Businesses must be required to publicly disclose child rights due diligence reports, ensuring greater accountability and visibility in corporate compliance.

e. Establishing Child-Friendly Complaint and Remediation Mechanisms

Many affected children, particularly in migrant labour, informal sectors, and high-risk industries, lack safe reporting channels to seek protection from exploitation. It is essential to establish accessible, child-sensitive complaint mechanisms within corporate structures, regional institutions, and government agencies.

- ***Mandating Business Grievance Mechanisms:*** Governments must require companies to implement formal child protection reporting systems within their supply chains.
- ***Developing a Regional Child Protection Hotline:*** The ACERWC and RECs should introduce a cross-border hotline for children to report abuse, trafficking, and unsafe working conditions.

- ***Enhancing Corporate Remediation Programs:*** Businesses should expand efforts to remediate child labour, ensuring that rescued child workers receive education, healthcare, and social protection services.

f. Integrating Child Rights into Climate Resilience Strategies

Climate change is increasing child labour migration, particularly in the agriculture, fisheries, and extractive industries. However, business frameworks often neglect environmental risks as a significant child rights issue.

- ***Embedding Child Rights in Climate Policies:*** Governments and treaty bodies should incorporate child labour risk assessments into national and regional climate adaptation strategies.
- ***Promoting Sustainable Corporate Practices:*** Businesses should adopt ethical supply chain practices that prevent climate-related displacement and the exploitation of child labour.
- ***Developing Regional Environmental Impact Assessments:*** RECs should establish cross-border environmental standards that address child protection risks.

g. Implementing Incentives for Ethical Business Practices and Corporate Compliance

To promote ethical business practices and ensure corporate compliance with Children's Rights and Business (CRB) principles, both regional and national frameworks must be developed to create incentives for compliance and penalties for violations. These measures should be embedded within economic policies, trade agreements, corporate governance structures, and enforcement mechanisms.

i. Tax Incentives for CRB-Compliant Companies

- ***RECs*** such as ECOWAS, SADC, and COMESA should ***develop harmonised tax incentive policies for businesses that comply with CRB standards***. These incentives can be embedded in regional investment and trade agreements, ensuring that multinational corporations and local businesses across Africa benefit from tax relief if they meet child-friendly business criteria.
- The ***AfCFTA*** could ***introduce preferential trade terms for companies that integrate child rights protections into their operations,*** creating an incentive for businesses to adopt ethical labour practices across multiple African countries.
- The ***AU*** could ***establish a certification-based tax relief system,*** whereby businesses certified as child-labour-free receive reduced tariffs on exports or tax benefits for social contributions toward children's rights.

ii. Ethical Labeling and Consumer Awareness

The AU and RECs should establish an Africa-wide ethical labeling programme, certifying businesses that comply with child rights protections. Similar to Fair Trade or Rainforest Alliance certifications, this African Ethical Business Label would help consumers identify and support child-friendly businesses.

- The ***ACERWC and RECs*** should ***collaborate with multinational retailers to require ethical labeling on African-made products that adhere to child labour-free standards***. These labels would ensure that exported goods meet ethical consumer expectations in international markets.
- A ***regional consumer awareness campaign,*** backed by the AU and civil society organisations, should be launched t***o educate African consumers on the importance of supporting child-friendly businesses***.

iii. Stronger Enforcement and Penalties for Violations

RECs must harmonise corporate accountability measures, ensuring that child labour penalties are uniformly enforced across multiple countries. This would prevent companies from relocating child labour operations to countries with weaker enforcement mechanisms.

- ***Regional trade agreements should include child labour compliance clauses***, mandating that companies found guilty of child labour violations face export bans or restrictions within Africa.
- The ***AU and ACERWC should work with RECs to create an independent monitoring body, responsible for conducting corporate child labour audits across Africa.*** Companies found to be non-compliant should face continent-wide sanctions.

5. Advocacy for Advancing Child Rights and Business in Africa

a. Overview

The validation workshop that convened stakeholders from Ethiopia, Zambia, and Côte d'Ivoire not only confirmed the findings and recommendations of this multi-country assessment but also provided a foundation for future advocacy initiatives. Participants included representatives from CSOs, the African Union, and regional actors, who collaboratively developed national and regional advocacy priorities. These priorities reflect the diversity of local contexts and the common challenges in ensuring corporate accountability for children's rights across the three countries.

b. National-Level Priorities

Across all three countries, participants emphasised the importance of institutionalising the Children's Rights and Business Principles (CRBP) into law, policy, and practice. In Ethiopia, advocacy efforts will focus on incorporating child rights into labour and trade frameworks, improving data collection on child labour and youth employment, and utilising Ethiopia's industrial park platforms to engage businesses and workers. Stakeholders will also collaborate with the Ministry of Labour and Skills, the Ministry of Women and Social Affairs, and the Industrial Parks to promote cross-sectoral coordination and embed CRBP in industrial policy.

In Zambia, key priorities include engaging the Ministry of Labour and Social Security to ensure child-sensitive labour inspections, incorporating CRBP principles into the forthcoming National Action Plan on Business and Human Rights, and strengthening corporate engagement through industry associations. Civil society will also advocate for the operationalisation of the 2022 Children's Code and the integration of child rights into national procurement policies and sectoral standards in mining and agriculture.

In Côte d'Ivoire, priorities include collaborating with the cocoa sector to move beyond child labour monitoring systems and adopt broader child rights due diligence practices. Stakeholders will work with the Ministry of Trade and the Ministry of Family, Women, and Children to integrate CRBP into national development strategies. Importantly, the national coalition plans to sensitise businesses and

government entities on the use of child rights impact assessments (CRIAs) and ethical marketing standards.

Each country has developed a national action plan as a living document to guide their respective advocacy efforts. These plans will be refined and implemented in partnership with relevant government agencies, businesses, and child rights organisations.

c. Regional-Level Priorities

Beyond national efforts, workshop participants collectively identified cross-border advocacy priorities to be pursued at the continental level, targeting African Union institutions, treaty bodies, and Regional Economic Communities (RECs). A primary focus is legal harmonisation to ensure that children's rights are consistently protected across member states, particularly concerning child labour, corporate due diligence, and cross-border trafficking.

Stakeholders called for the integration of CRBP standards into regional trade agreements, such as the AfCFTA, and the development of REC-wide protocols on child rights impact assessments, safe supply chains, and ethical marketing. The necessity for cross-border monitoring systems was also emphasised, including shared child protection databases, coordinated inspections, and regional grievance mechanisms accessible to children and communities.

Importantly, the advocacy agenda includes the enhancement of REC engagement through technical training, capacity building, and the creation of child-sensitive business accountability platforms. RECs such as ECOWAS, COMESA, and SADC were identified as critical partners in ensuring policy coherence and enforcement across borders.

Civil society coalitions were recognised as essential drivers of this regional advocacy agenda. Participants committed to strengthening regional civil society organisation (CSO) networks that can effectively engage with bodies such as the African Committee of Experts on the Rights and Welfare of the Child (ACERWC), the African Commission on Human and Peoples' Rights (ACHPR), and the AfCFTA Secretariat.

A full set of national and regional advocacy plans from Ethiopia, Zambia, and Côte d'Ivoire is annexed to this report for reference and implementation.

CONCLUSION

This report highlights the urgent need to prioritise children within Africa's economic governance frameworks. The country studies and regional analysis illustrate that children continue to face a wide range of business-related harms, many of which remain unrecognised, inadequately regulated, or are regarded as secondary to economic advancement. From child labour in informal mining and agriculture to exploitative advertising and digital threats, as well as the exclusion of children's voices in policy discussions, children remain marginalised in the decision-making processes that directly affect their safety, dignity, and wellbeing.
However, the findings also demonstrate that change is attainable. Africa has a robust ecosystem of treaties, normative guidance, and institutional mandates for child protection, encompassing the African Charter on the Rights and Welfare of the Child, Agenda 2040, the ACERWC's General Comment on Sexual Exploitation, and emerging jurisprudence from the African Commission and African Court.

These frameworks, in conjunction with global instruments such as the Children's Rights and Business Principles (CRBP) and General Comment No. 16 of the UN Committee on the Rights of the Child, served as foundational references for the analysis. This was particularly evident in Côte d'Ivoire, where GC16 informed the articulation of obligations, and in Zambia and Ethiopia, where the CRBP influenced assessments of corporate responsibilities across various sectors.

Regional bodies, including the African Union Commission, Regional Economic Communities (RECs), the African Committee of Experts on the Rights and Welfare of the Child (ACERWC), the African Commission on Human and Peoples' Rights (ACHPR), and the African Court, are increasingly delineating the parameters of business accountability through studies, resolutions, peer reviews, and legal decisions. While these developments have yet to form a cohesive framework, they provide a foundation upon which future interventions can be constructed.

This report also aims to inspire practical action. The **national and regional advocacy plans** developed alongside this study capture locally identified priorities for reform and engagement. These plans, which are annexed to the report, provide a roadmap for country offices, civil society organisations, and regional actors to continue advocating for legal reforms, policy integration, and multi-sector collaboration to uphold children's rights in business.

Moving forward, the challenge lies not in a lack of tools or evidence, but in securing political will, fostering institutional coordination, and ensuring sustained investment. Governments must enforce the laws they enact. Businesses must recognise children not merely as consumers or workers, but as rights-holders. Regional bodies must harmonise standards and ensure accountability across borders. Civil society must continue to act as both a watchdog and a partner in the pursuit of justice for children.

Economic growth that neglects children is not development; it is deferred harm. A future that is conducive to Africa's children requires that their rights are not sidelined but systematically safeguarded within every aspect of the business landscape.

ANNEXES

Zambia: Advocacy Action Plan

Issue	Objective	Stakeholders	Proposed Activities	National/Regional	Resources
Gap in awareness of the role of business in child rights	Create broader awareness of the role of business in advancing child rights. Advocacy: Lack of appreciation of the impact of the business on children's rights	1. Relevant Governments 2. CSOs 3. Business Associations 4. Development Partners 5. Quais Government 6. Children 7. HRCs 8. Child Protection Committees.	Develop/contextualise training tools Undertaken training Monitoring and Evaluation	National	
Weak Regulation on Child Rights and Business Practices	Strengthening the regulatory power and framework of the relevant government agencies	As above + RECs and other Regional Bodies	Review and identify gaps in the existing regulations Refine the regulation to address identified gaps Promote/share good practices Promoting enforcement of the regulations RECS + Regional Bodies Setting standards and frameworks to guide their members Monitor adherence to standards	National and Regional	
Lack of coordination mechanisms	Creation/Strengthening Coordination Mechanisms Enhancing coordination and effectiveness	1. Government 2. Business 3. CSO 4. Human Rights Commission	1. Providing Technical Support to the coordinating members 2. Review of Child Rights and Business 3. Assessment of various coordination mechanisms. 4. Facilitate experience sharing and learning among member states.	National and Regional	

Ethiopia: Advocacy Action Plan

Issue	Objective	Stakeholders	Proposed Activities	National/Regional	Resources
Limited/ lack of legal protections for children in the informal sector	To advocate for the extension of legal and policy protections for children working in or affected by the informal sector. To strengthen national legal frameworks to address child labour, exploitation, and unsafe conditions within informal work environments. To enhance awareness and enforcement mechanisms among local authorities, communities, and informal sector actors to better protect children's rights.	Ministry of Labour; Justice, Women & Socal Affairs; CSOs; academia; Chamber of Commerce; Community leaders; Children's parliament; National Youth Council; Youth Groups; Media	Stakeholder mapping, to gather data/evidence on children working in the informal sector Consultative workshops/ dialogues Awareness raising on the Labour Proclamation No. 1156/2019 Capacity strengthening on children's rights and business (gvt, CSOs, businesses) Developing policy briefs National level	TBA	Financial and technical
Lack of awareness of the child Rights and Business Principles	To increase awareness and understanding of the Child Rights and Business Principles among government institutions, businesses, and civil society. To promote the integration of child rights into business policies, practices, and national regulatory frameworks. To build the capacity of key stakeholders to identify, prevent, and address business-related risks to children's rights.	Same as above	Awareness raising/ capacity strengthening initiatives Translation into local languages Child-friendly version of the CRBPs National level		Same as above

Côte d'Ivoire: Advocacy Action Plan

Issues	Objective	Stakeholders	Proposed activities	National/regional	timeline	Ressources
Lack of a pan-African NGO network committed to promoting the CR and business agenda.	Capacity building, data collection, experience sharing, and monitoring of recommendations.	African CSOs, IOs, and development partners. Establishment of a restricted committee	Create a pan-african NGO network: Draft a ToR to define the mandate, responsibilities, operating mode, and working arrangements. Resource mobilisation.	Panafrican	6 months to draft the ToR 12 months to mobilise resources. 18 months to finalise the details for the establishment and legally register the network.	Financial and technological resources.

Absence a child code	Strengthen children's rights by developing a specific legal code that addresses issues holistically.	Government, in particular the Child Protection Department Technical and financial partners CSOs (forum of NGOs helping children in difficulty) Children's associations (national platform of children's associations and children's parliament)	Conduct consultations with relevant stakeholders, including experts from government, CSOs, international partners Hire consultant Propose a draft law on the child code Establish a national action plan with stakeholders and members of parliament to have the project carried by a parliamentary group (friends of children) Presentation of the law by the Ministry of Women, Families, Children, adoption and promulgation.	National	3 years	Financial, technical and human resources
Lack of knowledge of CRBP aspects by companies and the private sector	Awareness creation on CRBP with a view to integrating child protection principles into their business activities and implementing CRBP.	Business, CSOs & state actors	Advocate before the AU to integrate a child rights perspective into the upcoming AU policy on HR and Business. Contextualization of the Policy by REC and disseminate the Policy at the national level	Regional & national	2-3 years	Financial, technical and human resources

Persistent child labour in agriculture, gold mining and the informal economy	Reducing child labour through coordinated, sustainable action	National Supervisory Committee (CNS); Ministry of Employment; MFFE; agricultural cooperatives; companies; NGOs ILO; ICI	• Appropriate integrated cultural approaches - Strengthening community monitoring systems - Creating alternatives for families (income, schooling) - Tougher penalties for non-compliant companies • Inclusion of CRBPs in industry contracts (cocoa, mining, etc.)	National / Local	3- 5 years	Financial, technical and human resources
Low involvement of children in decision-making processes	Reinforce children's active and structured participation in the development of public policies	Ministry for Women, the Family and Children; Children's Parliament; National Council for Human Rights; CSOs specialising in citizen participation.	- Set up permanent mechanisms for consulting children (forum, digital platform, etc.). - Train children in civic expression and accountability - Institutionalise policy accountability to children • Setting up a national reference framework for child participation in Côte d'Ivoire.	National	2- 3 Years	Financial, technical

Regional Level: Advocacy Action Plan

Issue	Objective	Stakeholders	Proposed Activities	National/Regional	Resources
Gap in awareness of the role of business in child rights	Create broader awareness of the role of business in advancing child rights. **Advocacy:** Lack of appreciation of the impact of business children's rights	• Relevant Governments • CSOs • Business Associations • Development Partners • Quais Government • Children • HRCs • Child Protection Committees.	1. Develop/contextualise training tools 2. Undertaken training 3. Monitoring and Evaluation	National	
Weak Regulation on Child Rights and Business Practices	Strengthening regulatory power and framework of the relevant government agencies	As above + RECs and other Regional Bodies	1. Review and identify gaps on the existing regulations 2. Refine regulation to address identified gaps 3. Promote/share good practices 4. Promoting enforcement of the regulations RECS + Regional Bodies 1. Setting standards and frameworks to guide their members 2. Monitor adherence to standards	National and Regional	

Lack of coordination mechanisms	Creation/Strengthening Coordination Mechanisms Enhancing coordination and effectiveness	Government Business CSO Human Rights Commission	1. Providing Technical Support to the coordinating members 2. Review of Child Rights and Business 3. Assessment of various coordination mechanisms. 4. Facilitate experience sharing and learning among member states.	National and Regional	

WHO WE ARE

Save the Children believes every child deserves a future. In East and Southern Africa and around the world, we do whatever it takes—every day and in times of crisis—so children can fulfil their rights to a healthy start in life, the opportunity to learn, and protection from harm. Our experts go to the hardest-to-reach places where it's toughest to be a child. We ensure children's unique needs are met and their voices are heard.

Together with children, families and communities, as well as supporters the world over, we achieve lasting results for millions of children. With over 100 years of expertise, we are the world's first and leading independent children's organisation – transforming lives and the future we share.

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