

# **Study Report on Child Labour in the Shipbreaking Sector in Bangladesh**

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# Study Report on Child Labour in the Shipbreaking Sector in Bangladesh

## 1. Introduction

Having started in the 1980s, the shipbreaking sector now employs 30,000 workers directly and about 100,000 workers indirectly. The industry generates significant tax revenues for the government and supplies about 55-60% of the total steel needed for construction works within the country. Shipbreaking yards are suppliers of second-hand machineries, various materials and thousands of tons of recycled steel. Bangladesh is currently the largest shipbreaking country in the world in terms of tonnage. Every year, 100-120 large ocean-going vessels are recycled in approximately 60 active yards among 155 registered yards<sup>1</sup>. Despite the importance of the shipbreaking industry, the government has no official statistics of recycling activities, working conditions, the occurrence of child labour or the status of compliance with labour standards and regulations relevant for shipbreaking activities.

In 2008, the NGO Shipbreaking Platform and its associate organisations YPSA and FIDH, ventured into a comprehensive study on child labour in shipbreaking yards in Bangladesh. The study was based on field work carried out in the Chittagong shipbreaking area and the localities from where children came to work in the yards. The research revealed that 25% of the total work force in shipbreaking sector were under 18 years old, and that around 10% of the children were below 12 years<sup>2</sup>. The report also highlighted the dangerous working conditions in the yards, problems of child workers and the push and pull factors for recruitment of children.

Ten years later, a new assessment is needed. This study aims to evaluate to what extent the illegal employment of children remains a serious problem in the shipbreaking sector of Bangladesh. It also seeks to shed light on the socio-economic context that pushes children

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<sup>1</sup> Labour Resource Support Centre (LRSC) of Bangladesh Institute of Labour Studies (BILS), and Bangladesh Ship Breakers and Recyclers Association (BSBRA).

<sup>2</sup> "Childbreaking Yards: Child Labour in the Ship Recycling Industry in Bangladesh", FIDH, YPSA, NGO Shipbreaking Platform (2008) at p. 05, URL: <https://www.fidh.org/IMG/pdf/bgukreport.pdf>

into extremely hazardous shipbreaking jobs. Concerns related to child labour in the yards still exist and the conditions under which child workers are exposed.

## **2. Methodology**

The study was undertaken through a short-term field work (45 days) carried out in and around different shipbreaking yards in Chittagong. Due to the non-availability of workers' database and restricted entry into the yards, a quantitative survey method for the identification of the exact number of child workers would have required a long-term research and a sizeable budget to be carried out. A qualitative method was therefore used to make an estimation of the percentage and to quantify the presence of child workers.

### **2.1 Primary data collection**

The research team was assisted by YPSA's field staff for the collection of primary data in January and February of 2019. Appropriate qualitative methods, *i.e.*, Focus Group Discussion (FGD), Key Informant Interview (KII), Case Study (story telling), as well as Observation & Estimation were used, and a questionnaire was developed to conduct a limited survey, FGD and case studies with the child workers. Appropriate variables of the questionnaire were identified after initial interviews with two key informants and related tasks were determined to assess the presence of child labour in the yards.

The study team interviewed 50 child workers, family members of the children, trade union leaders, foremen and contractors. Some of the respondents were adult workers who had started working in the yards as a child before they turned 18. The study team also interviewed officials from the labour administration, representatives of the shipbreaking yard owners association (BSBRA), experts on child labour, NGO representatives and local people. Semi-structured interviews were conducted with selected respondents to portray the case studies.

Data from 33 of a total of 60 active yards in Sitakunda shipbreaking zone was collected. Firstly, limited survey was conducted among child workers from 19 different yards and secondly, the field team visited 22 shipbreaking yards, both during day and night shifts, in order to observe workers entering the yards. The total number of yards from where information was collected are figured out at 33 in aggregate. The team found prevalence of child labour in all these yards. Non-probability sampling technique was used to select respondent child workers for interviews, FGD and case studies. Because there was no easy access to the yards and workers,

all the samples were chosen on the basis of availability of the respondents and instant opportunity to visit the yards. The stories of two child workers were selected as illustrative case studies, reflecting common patterns of the testimonies gathered and representing different backgrounds, such as different job roles, origin, socio-economic background or reason to work in the yards.

## 2.2 Secondary data collection

A review of secondary resources such as study reports, articles, government documents and online resources yielded various information with regard to the legal aspects of child labour in Bangladesh.

## 3. Legal Framework of Child Labour

Children deserve distinct rights to protection because of their young age, lack of knowledge, experience and physical strengths, as well as lack of power to defend their own interests in an adult world. Every child has the right to develop physically and mentally up to his or her full potential. Children also need to be protected against economic exploitation and hazardous work, slavery and infringement to family live.

There are different sets of national and international legal frameworks for the regulation of child labour and protection of children engaged in shipbreaking yards in Bangladesh:

National Law	International Law
<ul style="list-style-type: none"> <li>a. <i>The Bangladesh Labour Act 2006</i></li> <li>b. <i>The Bangladesh Labour (Amendment) Act 2013</i></li> <li>c. <i>The Bangladesh Labour (Amendment) Act 2018</i></li> <li>d. <i>The Bangladesh Labour Rules 2015</i></li> <li>e. <i>List of Hazardous Works for Children in Bangladesh; SRO NO 65-LAW/2013</i></li> <li>f. <i>The Children Act 2013</i></li> <li>g. <i>The National Child Labour Elimination Policy 2010</i></li> <li>h. <i>The National Child Policy 2011</i></li> <li>i. <i>The Labour Welfare Foundation Act 2006 (Rules 2010)</i></li> <li>j. <i>The Birth and Death Registration Act 2004</i></li> </ul>	<ul style="list-style-type: none"> <li>a. <i>ILO Minimum Age for Employment Convention, 1973 (C-138)</i></li> <li>b. <i>ILO Minimum Age Recommendation 1973 (No. 146)</i></li> <li>c. <i>ILO Worst Forms of Child Labour Convention, 1999 (C-182)</i></li> <li>d. <i>ILO Worst Forms of Child Labour Recommendation 1999 (No-190)</i></li> <li>e. <i>ILO Minimum Age (Industry) Convention (Revised), 1937 (C-59)</i></li> <li>f. <i>UN Convention on the Rights of the Child 1989</i></li> </ul>

Child labour is generally prohibited worldwide both in hazardous and non-hazardous works if proved to be harmful to the children<sup>3</sup>. Whether or not a “work” can be called “child labour”

<sup>3</sup> This does not mean to prohibit recruitment of children in all types of works. Some economic activities of

depends on the child's age, type and hours of work performed, the conditions under which it is performed, and the objectives pursued by individual countries. The International Labour Organisation (ILO) defines child labour as the employment of children in works that deprive them of their childhood liveliness, prevent their education and that are dangerous or harmful to them physically, mentally, socially or morally<sup>4</sup>.

Since the main focus of the study is worst forms of child labour in the shipbreaking sector, the discussions will be confined to a legal review of minimum employable age and worst form of child labour as evidenced in the shipbreaking yards.

### ***3.1 Minimum Age for Employment: The 14-Year Rule***

ILO Convention 138 (not ratified by Bangladesh, but compulsory for each party to the organisation as being part of the fundamental norms of ILO) and its accompanying Recommendation (No. 146) set the threshold of child labour or minimum age for admission to employment.

In the case of developing countries, the minimum age for employment in ordinary or non-hazardous work is 14 years or the end of compulsory schooling (whichever is higher)<sup>5</sup>. The ILO requires every State to pursue a national policy designed to ensure effective abolition of child labour and establish the minimum age for admission to employment at a level consistent with the fullest physical and mental development of young persons<sup>6</sup>. Bangladesh's National Child Labour Elimination Policy 2010 was formulated in congruence with ILO's requirement to eliminate child labour. Complying with ILO standards, the Labour Act 2006 categorically prohibits recruitment of children in any work below the age of 14 years. Thus, in Bangladesh,

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children are acceptable if they meet certain conditions with regard to age, type and duration of work. On the other hand, if the works are hazardous or harmful to the health, education and morals of children and hamper their physical and mental development, this is unacceptable or unlawful child labor. International labor standards distinguish between acceptable and unacceptable forms of child labor in all types of employments.

<sup>4</sup> ILO (2012) "What is Child Labor", Geneva; URL: [www.ilo.org/ipec/facts/lang--en/index.htm](http://www.ilo.org/ipec/facts/lang--en/index.htm). When children of a given country aged between 5-17 years are involved in economic activities, it is referred to as child labor. There is no single legal definition of child labor that can be used around the world. Taken together, ILO Conventions 138, 182 and Recommendation 190 provide the definitional basis for the following terms: child labor, worst forms of child labor, and hazardous work for children.

<sup>5</sup> As per the C-138, every country must ensure that no person is employed at less than the school-leaving age, if schooling is available. However, after consultation with trade unions of employers and workers, national government may allow exceptions to the minimum age threshold in some special circumstances, but not to the basic rules.

<sup>6</sup> See Article 1, ILO Convention 138. The National Child Labour Elimination Policy 2010 was formulated in compliance with article 1 of Convention 138.

the minimum age for employment in regular, non-hazardous work is 14 years and no child below 14 years can be appointed to work in any occupation or establishment<sup>7</sup>. The law identifies all works done by under-14 persons as child labour. Similarly, any person below 14 years employed to do any work will be regarded as child labour<sup>8</sup>. Bangladesh's law of minimum employment age for regular, non-hazardous jobs is thus fully aligned with ILO Convention 138.

For risky or hazardous work, however, the ILO Convention 138 that sets 18 years as the minimum age for employment. In line with ILO Convention 138 that sets 18 years as the minimum age for employment in risky or hazardous work, the threshold of minimum age for employment in hazardous or dangerous jobs in Bangladesh is also lifted from 14 years to 18. As such, appointment of any under-18 person for dangerous and hazardous work (such as shipbreaking) is prohibited in Bangladesh as it is considered a worst form of child labour.

### ***3.2 Worst Forms of Child Labour***

The UN Child Rights Convention (1989), ILO Convention 182 (not ratified by Bangladesh, but compulsory for each party to the organisation as it is part of fundamental norms of the ILO<sup>9</sup>) and its Recommendation 190 target the worst forms of child labour (WFCL) in all economic sectors as a matter of urgency. They provide the international legal framework to eliminate worst forms of child labour in all countries. Convention 182 defines WFCL as works that are likely to harm the health, safety or morals of children.

The Child Rights Convention and its Optional Protocols seek to protect all children below 18 years from economic exploitation, hazardous work, and work that interferes with the child's education or is harmful to the child's health, moral or social development.

In Bangladesh, the Labour Act 2006 and the National Child Labour Elimination Policy 2010 provide the national legal framework to address the worst forms of child labour. Bangladesh's National Child Labour Elimination Policy 2010 puts emphasis on 'working environment' for

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<sup>7</sup> Vide, sections 34, 35 and 2 (63) of the Labour Act 2006. They provide safeguard to needy children who are recruited to work at the cost of their health, safety and lives. Sections 34 and 35 directly prohibit child labour and section 2 (63) defines 'child' as a person who is below 14 years of age.

<sup>8</sup> Until the amendment to the Labour Act in 2018, the law conditionally allowed employment of children between 12-14 years to do 'light work'. The 2018 Amendment obliterated this age slab of 12-14 years from the Act. At present, there is no legal scope for child labour in Bangladesh with regard to under-14 children.

<sup>9</sup> See ILO Declaration 1998.

determining hazardous work for children. According to this Policy, a child becomes subject to hazardous or harmful work if it:

- a) creates undue pressure on his/her physical and psychological health and social status;
- b) is unsafe or unhealthy for him/her;
- c) is disproportionate to his or her capacity;
- d) hinders his or her education;
- e) demeans his/her human dignity; and
- f) poses risk of physical or mental torture and sexual exploitation
- g) allows no opportunity for leisure or recreation.

### ***3.3 Hazardous child labour***

Hazardous child labour, a subset of worst forms of child labour, is defined by the ILO as an employment or work which is likely to harm or jeopardize the physical and mental health, safety, moral or social development of children<sup>10</sup>. ILO Recommendation 190 also refers to the following circumstances of hazardous child labour : (a) work which exposes children to physical, mental, or sexual abuse; (b) work underground, under water, at dangerous heights or in confined spaces; (c) work with dangerous machinery, equipment and tools, or which involves the manual handling or transport of heavy loads; (d) work in an unhealthy environment which may expose children to hazardous or harmful conditions that cover substances, agents, processes, temperatures, noise levels, or vibrations harmful to health; e) work under difficult conditions, i.e., work for long hours, night work or work where the child is unreasonably confined to the premises of the employer<sup>11</sup>. The types of hazardous work for children may vary from country to country because countries are allowed to define hazardous work in their own context. ILO Convention 182 urges the national governments to formulate the legal framework of hazardous child labour (HCL) in accordance with relevant international standards, Recommendation 190 and opinions of the employers' and workers' representatives<sup>12</sup>.

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<sup>10</sup> Section II, Paragraph 3 of ILO Recommendation 190. It gives detailed guidance on identifying "hazardous work". The Labour Act 2006 and the National Child Labour Elimination Policy 2010 also substantially recognize the circumstances described in Recommendations-190 through various provisions.

<sup>11</sup> Section II, Paragraph 3 of ILO Recommendation 190. It gives detailed guidance on identifying "hazardous work". The Labour Act 2006 and the National Child Labour Elimination Policy 2010 also substantially recognize the circumstances described in Recommendations-190 through various provisions.

<sup>12</sup> Section II, Paragraph 3 of ILO Recommendation 190. It gives detailed guidance on identifying "hazardous



The draft National Child Labour Elimination Policy (2008) identified shipbreaking as a most hazardous job. In 2010, the final policy formulated by the Government denounced shipbreaking as an industry where unacceptable child labour is commonly found. Subsequently, in March 2013, the Ministry of Labour and Manpower published a list of 38 economic activities hazardous or dangerous for children which includes shipbreaking in serial no 16<sup>13</sup>. Thus, in Bangladesh, the employment of children below 18 years of age in the shipbreaking yards is clearly prohibited as it is considered hazardous child labour and one of the worst forms of child labour. It should furthermore be noted that the Labour Act 2006 forbids the appointment of children (under 14) and adolescents (from 15 to 18) for night works and in harmful or risky jobs<sup>14</sup>.

#### **4. Current Practices of Child Labour in Shipbreaking**

This part of the study assesses current practices of child labour in the shipbreaking yards in Chittagong and covers an estimated percentage of how many shipbreaking workers are under-18 years of age, comparing with the findings of earlier study report from 2008<sup>15</sup>.

##### ***4.1 Presence of Child Labour in Shipbreaking Yards***

During the interviews, some respondents expressed their ignorance about the existence of child labour in shipbreaking yards, some additionally argued that children can under no circumstance be recruited in the yards because shipbreaking requires considerable physical strength. The yard owners further claimed that they were not interested in suffering from reputational damage by employing under-18 young workers. The reality is, however, that child workers are still recruited in many shipbreaking yards.

During our field study, we found presence of child workers in all of the 33 active shipbreaking yards from where primary data was collected. The ages of all children we came across were

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work". The Labour Act 2006 and the National Child Labour Elimination Policy 2010 also substantially recognize the circumstances described in Recommendations-190 through various provisions.

<sup>13</sup> *Vide*, SRO NO 65-LAW/2013; issued by the Ministry of Labor and Manpower, Government of Bangladesh in pursuance of section 40(3) of the Labor Act 2006. ; *Also*, ILO (2014), "Compendium of hazardous child labor lists and related legislation for Bangladesh" URL:

[http://www.ilo.org/ipecc/Informationresources/WCMS\\_382487/lang--en/index.htm](http://www.ilo.org/ipecc/Informationresources/WCMS_382487/lang--en/index.htm)

<sup>14</sup> *Vide*, sections 34, 35 and 2 (63) of the Labour Act 2006. They provide safeguard to needy children who are recruited to work at the cost of their health, safety and lives. Sections 34 and 35 directly prohibit child labour and section 2 (63) defines 'child' as a person who is below 14 years of age.

<sup>15</sup> Childbreaking Yards: Child Labour in the Ship Recycling Industry in Bangladesh", FIDH, YPSA, NGO Shipbreaking Platform (2008) at p. 05, URL: <https://www.fidh.org/IMG/pdf/bgukreport.pdf>

estimated to be between 15-17 years, as also later confirmed by the respondents<sup>16</sup>. Whilst the 2008 report of the NGO Shipbreaking Platform recorded wide presence of very young children between 7-12 years, the study team in 2019 did not find any child below 15 years working in any of the active shipbreaking yards that were observed<sup>17</sup>. Recruitment of under-14 children in shipbreaking yards seems to have stopped. This indicates a clear improvement in the child labour situation in the shipbreaking sector over the last decade.

Several factors may explain why hiring young children has decreased, such as the action of NGOs and media reporting. Interviews pointed out the new policies adopted by the government that may expose yards owner to reputational damage and litigations, and the fact that the labour administration and other government agencies have recently increased their monitoring of the reported yards.

Pointing to the fact that child labour is a persistent problem in shipbreaking yards, in 2018, the shipbreakers' and recyclers' association (BSBRA) issued a letter to the member yard owners strictly warning them not to employ children and adolescent workers in their establishments. The respondent foremen and adult workers informed that recruitment of child workers in shipbreaking yards dropped drastically after the issuance of the letter as many yard authorities started then to ask the newly recruited workers to submit copies of national ID card or birth registration certificate as proof of adulthood (18 years).

Whilst during the interviews and FGD, the respondents also said that some yards are comparatively better than others and have 'zero' child labour, they could not inform how many and which yards fall in this category. The field team found, on the other hand, existence of child labour in all 33 yards, out of a total of an estimated 60 active yards, they observed.

#### ***4.2 Percentage of Child Labour***

The cumulative outcome of observation, interviews and FGD with the respondents is that there is an estimated 13% child labour among the shipbreaking workers in Chittagong, Bangladesh. On-spot observation in the yards conducted both during day and at night found

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<sup>16</sup> The foremen, contractors, adult workers and the unionists unanimously argued that children below 15 years are not seen in any yard. They told that there had been no fresh recruitment of minor boys in the yards since the middle of 2018.

<sup>17</sup> All under-18 workers employed in shipbreaking yards are adolescents as defined by the Labour Act 2006. They all are recognized as children both under international and national legal standards. For details, vide legal review of 'child labour' above.

approximately 6% of all workers engaged during dayshifts are children, and during night shifts the percentage of child workers was estimated to be 20%. The overall estimated child labour in shipbreaking yards, combining both day and night shifts, is 13% of all workers. It is, however, not excluded that there might be more child workers than were counted<sup>18</sup>.

The NGO Shipbreaking Platform's report from 2008 found the proportion of children working at the yards as high as up to 25%. Whilst the decrease in the percentage of child workers is a positive step in the right direction - as is the abovementioned decrease and seeming halt in the employment of children below 14 - this study identifies negative trends such as an increased deployment of children hired during night shifts.

The study team found that a concerning 20% of the workforce were children during the night shifts<sup>19</sup> in the yards observed. The number of child workers involved in nightshifts mentioned in the Platform's 2008 report was lower than the number estimated in 2019<sup>20</sup>. The recruitment of children for night shift work in the yards has increased sharply over the years. This is a significant change in the child labour dynamics of the shipbreaking sector in Bangladesh. According to our observation and estimation, the number of child workers employed during night-time is more than three times higher than the children working daytime. The foremen and respondent child workers said that the main reason for engaging children in night shift work is to circumvent the monitoring of labour inspectors, media, NGOs and safety officers. There are very few inspections at night, and most safety officers leave the yards at 5.00 pm.

### ***4.3 Profile of Child Workers in Shipbreaking Yards***

#### **Origin**

The child workers of shipbreaking yards, all of which are boys, come from different parts of the country. Most belong to very poor families consisting of siblings and parents. A typical

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<sup>18</sup> There is also hidden child labour in low compliant yards, as told by the local people. The yard management arranges food and accommodation for these children within the yard premises at clandestine locations for night work. But the study team could not find any trace of such covert child labour practice at night.

<sup>19</sup> During the FGD, participants confirmed told that considerable number of children including themselves are used by the owners in night works in the yards.

<sup>20</sup> Childbreaking Yards: Child Labour in the Ship Recycling Industry in Bangladesh", FIDH, YPSA, NGO Shipbreaking Platform (2008) at p. 05, URL: <https://www.fidh.org/IMG/pdf/bgukreport.pdf>

family size ranges between 5-7 members. Average monthly income of a family is between 120-180 USD per month. Some low-income families even earn much below 120 USD every month. Education of the child workers' family members is, by and large, up to primary school, though some have gained secondary school education. There is presence of a considerable number of tribal boys in the yards representing different ethnic groups from the Chittagong Hill Tract districts . During our survey, we met several boys of *Tripura* and *Marma* tribes (small ethnic population) coming from Matiranga of Khagrachari hill district. All these tribal boys were found to work in a particular yard. The tribal boys were reluctant to discuss about their problems in the yards and skipped questions.

### **Level of education**

The children working in shipbreaking yards are generally school leavers who were forced to discontinue education due to inability and hardship of their parents. Low family income or poverty was the main cause of premature break-up of their education. Most of the children interviewed (more than 70%) could not go beyond primary level and studied at best up to the 5<sup>th</sup> grade, whereas, a number of them (26%) had the opportunity to go to secondary school. While almost all child workers were forced to leave their schools before joining the yards, very few fortunate ones (4%) were found to have earned secondary school certificate (school completion certificate) or studying in the college. The latter group have high ambition to study more. They want to go further and will leave the shipbreaking job once their graduation will be completed and consider the shipbreaking job as a means of financing their higher education. They usually work in the night shift and attend classes in the daytime.

### **Length of service**

The child workers are recruited in the shipbreaking yards through different channels including via relatives, friends, acquaintances and contractors. Shipbreaking is the first job of almost all child workers who have been working for 1-2 years. Some of the interviewees had only worked at the shipbreaking yards for a few months, and only a small number of children had worked in other jobs before coming to the yards. For example, Sagor (17) was a farmer in his village, Ripon (17) used to work in a printing shop in Dhaka, Sazzad (17) had worked in grocery shop for two years, and Anarul (16) was a construction worker for a year prior to becoming a shipbreaking worker.

## **5. Socio-Economic Context of Child Labour in Shipbreaking Yards**

## **5.1 Push Factors**

There are various push and pull factors that force the children to work in the shipbreaking yards risking their lives to earn only 3-5 dollars (estimated Taka 250-420) per day. These factors are driven primarily by economic, social and familial reasons and have remained almost the same over the last 10 years. The reasons which push the remote villagers to send their teenage sons to work in shipbreaking yards are extreme poverty, hardship, low family income or non-availability of better earning source, death of father, disappearance of father after marrying another woman, family debts, loss of land or landlessness etc.

Although Bangladesh's graduation from the Low Development Country group marks a sign of improvement in poverty reduction, a large proportion of its citizens still suffer from privation, malnutrition, resource constraints and very low family income. Poverty or financial crisis is still the main reason for the child workers and their families to choose jobs in shipbreaking yards<sup>21</sup>.

While struggling with the extreme hardship, they are entangled with debts and other livelihood crises. The respondents shared different reasons for their involvement in the yards, such as: there is no one else in the family capable of earning or to support family needs or to bear family expenses including illness of parents, or to pay off family debts. In order to add to the low family income, and often alongside the father, one or more sons enter into “survival jobs” in different occupations including farming, security guard, shop keeping, rickshaw pulling, or more risky and dangerous jobs such as shipbreaking. Due to low family income and unbearable education costs, the parents withdraw their children from school and send them outside to earn money.

## **5.2 Pull Factors**

Alongside the reasons that ‘push’ children to work at the shipbreaking yards in Chittagong, there are also “pull factors” that attract them to this precarious working environment. For example, easy accessibility to shipbreaking jobs without experience, scope of better income, yard owners accepting children as they are cheap labour, etc.

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<sup>21</sup> Poverty is the major contributing factor to justify why still 13% of the shipbreaking workers are children below 18 years of age. According to *Bangladesh Household Income and Expenditure Survey 2016-2017*, the country's poverty rate was reduced to 24,3% at the end of 2016 from 31,55% in 2010. The extreme poverty rate was measured at 12,9% in 2016 compared to 17,6% in 2010. See ‘Bangladesh Household Income and Expenditure Survey 2016-2017’, Bangladesh Bureau of Statistics (BBS).

All respondents said that they came to work at the yards because they knew they could easily find work here without any skillset, qualification or prior experience. The yard owners do not ask the workers for any previous experience or skill as is seen in other formal sectors (textile, RMG). Getting a job in a shipbreaking yard is therefore relatively easier than in other sectors.

Working in the shipbreaking yards also provides the child workers with a higher income than many other precarious or irregular jobs they had pursued elsewhere, *i.e.*, farming, shop kipping, restauration, factory job etc. The prospects of better income thus drove especially the village boys into extremely dangerous working conditions. Moreover, there were some other boys who had pursued jobs in other occupations, but had failed to manage due to lack of skills. Only few of the children said that the attraction to shipbreaking job was regular and timely payment of wages by the yard management. Some local boys work in shipbreaking yards at night because they still attend school in daytime.

However, most respondents stated that their conditions have not improved up to the expectations and that they still remain poor and continue to face malnutrition and precarious living conditions.

## **6. Working Conditions at the Shipbreaking Yards for Child Workers**

Working in shipbreaking involves high risk of injury or death. Accidents occur due to the poor working environment. According to available information, 20 workers died and five were severely injured due to accidents at the yards in 2018. Until March 2019, at least three workers died and three were injured. During 2016-2018, a total of 57 deaths and 39 injuries of shipbreaking workers in Chittagong were reported in various media platforms<sup>22</sup>. Whilst no child worker was reported to have died or seriously injured in the last few years, the risk of death, injury or illness prevails for all children working in the yards.

Shipbreaking yards are by and large unsafe and harmful for the health of workers. There are flagrant violations of basic labour rights and shipbreaking regulations at the yards as shipbreaking workers are deprived of appointment letter, ID card, minimum wages, proper working hours, paid leaves and holidays, safe workplace, bonus, insurance, compensation and other benefits. The recruitment of children for involvement in the hazardous or dangerous

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<sup>22</sup> Source: Labour Resource Support Centre (LRSC) in Chattogram, Bangladesh Institute of Labor Studies (BILS).

operations of shipbreaking is furthermore illegal as described in the sections above.

The common occupational health and safety (OHS) risks in shipbreaking yards as identified by the child workers are:

- a) dangerous and harmful working conditions
- b) unhealthy and filthy surroundings
- c) fume and dust
- d) black oil, burnt Mobil, poisonous gas and fire flames
- e) heavy sound
- f) excessive heat of the gas torch
- g) scorching sun and its blistering heat
- h) fatal accident, inflammation and blast

The children informed of having experienced several difficulties while working in the yards. Many told that they had suffered from various health problems for which they cannot afford proper treatment. The following health problems were commonly identified by the respondent child workers:

Cut or injury on the body	Stomach pain	Vomiting due to fumes, gas & burnt oil smells
Bodily pain	Chest pain	Headache
Skin disease	Physical weakness	Coughing/ Fever
Eye infection / inflammation and redness	Asthma	Nausea
Dizziness due to excessive sound & sun heat	Hearing loss	Insufficient sleeping

Whilst most of the child workers interviewed were aware of the dangers they were exposed to at the shipbreaking yards, it was observed that a few child workers were not aware of the full extent of health and safety hazards in the yards. During the interviews, they could not identify their problems and difficulties, and they seemed to be oblivious about the working conditions in the yards and the consequences thereof. This is a worrying issue in addition to

the existing precarious working conditions they are exposed to. The sections below describe more specifically the conditions of child workers in the yards, and highlights particular concerns related to the increase of children employed during night shifts.

### ***6.1 Types of Work***

According to the information provided by the respondents, there are different categories of child workers in the shipbreaking yards, such as cutter helper, cleaning or mud group, wire or cable group, loading or loader group and fitter group.

The children are mostly employed as cutter helpers in the shipbreaking yards whose primary job is to help the cutter master in cutting the iron plates into smaller pieces. Almost all of the child workers we talked to are working as helpers in the yards. There are for example various tasks associated with the dismantling of iron sheets. Cutter helpers assist the cutter master in lighting gas torches, they hold the gas pipe and make sure the gas torch is well fed and also hold an umbrella over the cutter man to protect him from the sun. The cutter helpers mark the plates, replace the empty gas cylinders with new ones, shift the cylinders from one place to other and lift the cylinders on the ship. They clean up the iron pieces by removing the rusts from the surface before cutting and pick up small and scrapped iron pieces from the ground. Some helpers work on the shore where large steel plates are dismantled into small pieces for recycling, whilst some work directly on the ship, though these were found to be very few. After a few years of apprenticing, the helpers can become cutter masters themselves.

Children also work in the group of mud cleaners who remove mud from all the cut off steel plates of the ship after they are dragged ashore. Their job includes cleaning or removing dirt, mud and rust from the iron plates, cleaning oil and wastes from the tanks. Sometimes, they also have to clean sludge from the metal pieces. The mud cleaner group is responsible for digging, carrying and loading muds.

Child workers also reported to work in the fitter group who disentangles or unscrews small tools and items from the hull of the ship. Finally, a small number of young boys work in the wire or cable group. They are engaged along with adult workers in pulling and carrying heavy chains and cables used to move parts of the ship. This activity is physically demanding as they have to walk in the deep mud with heavy loads. The respondents told us it is very hard for them to carry the heavy cables and hence only a few of them are engaged in this type of work



Only a few respondent children told that they had worked in the ship. There, they clean hazardous wastes from confined spaces within the hull. Working in such confined spaces, they are exposed to high risks of explosions because of the gas left in the hull. If there is an accident, the workers inside the hull may inhale highly toxic fumes. It is furthermore very hard for them to climb the ladder on board the ship, and obviously there is risk of falling down from 50-60 feet height.

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**Al-Amin** (17), a teenaged villager from Gaibandha district, engaged in shipbreaking because of family hardship and monetary needs. He started his career in shipbreaking yard when he was 15. He studied up to class four and then went to study in a madrasah (religious institution). His father does not work regularly and the family has extremely limited economic means. *"We are only two brothers. My parents are alive and live together. My elder brother was not contributing with money to the family expenses. I was passing idle time at home. I was thinking, life should not go in this way. Sensing the poor condition of my family, I decided to leave home for a job and got one in a shipbreaking yard through an acquaintance"*. Al-Amin works 12 hours a day as a cutter helper such many other boys of his age. Sometimes in the past he had to work even more with overtime not paid in legal rate. His daily earning is taka 400 out of which he spends for meals every day, at least 130 taka. After spending for his personal needs, Al-Amin sends the leftover money (around 50%) to his family living in the village. His family buy daily groceries on credit from the local shop. Once Al-Amin sends money home, his family pay off the credit. He lives in a rented dormitory and buys his meals from food shops. He used to cook, but he cannot do that now as his workload increased. He gets tired after finishing the daily work. Opportunities for taking rest are very rare, and he complained that he is forced to work even though he is very tired. Al-Amin is exposed to smoke, oils and flames while cutting the iron scraps and cleaning the tanks. His eyes become very painful due to the smoke. No basic safety equipment has ever been provided to him by the yard management, they only gave him a pair of gum boots. He had to buy other safety items at his own cost. The cutter man, Al-Amin's immediate boss, gave him second-hand gloves and a helmet. He does not even have any boiler suit. Al-Amin says he suffers from nose running, coughing, dizziness and bodily pains. While cutting the iron, the fire-blaze falls on his skin and creates blisters. Sometimes he has to cut the iron when his boss is resting. As a newcomer, he did not have any idea of how to ensure his safety, and now he still lacks proper equipment to protect him against the many hazards he faces. *"The working environment in the yard is very unsafe and unhygienic. I always have to wear dirty and torn clothes. I feel bad all the time. But I have to work even if it feels bad, I am undone and this is the reality of my life. Because we are poor and we don't have education, we have to earn a life working in the shipbreaking yards. It is very difficult to get an alternative good job for lack of education and essential skills. I will have to do this dangerous job no matter how bad I feel here."*, Al-Amin was pale and downhearted during the interview

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## ***6.2 Lack of Training and Personal Protective Equipment***

The child workers do not receive any training for shipbreaking works prior to joining the yard jobs. They have to rely on the senior workers who show them all basic “dos and don’ts” during the work.

Many of the respondents told that the yard authorities do not provide necessary equipment to ensure safe and healthy working conditions. Most yards only provide reconditioned gloves, helmets and boots to the workers. Fire safety, handling of inflammable and gaseous objects, hazardous waste management, machinery safety, cleanliness, hygiene and many other matters are completely overlooked. The personal protective equipment (PPE) supplied to the workers does not adequately protect them from the highly unsafe conditions they are exposed to. Shockingly, it was stated that the owners supply full sets of PPEs to workers only when Labour Inspectors or officers of the Department of Environment (DOE) visit their yards. The PPEs supplied are then taken back once the officers leave the premises.

The child workers told that they sometimes buy the shortfall items (helmet, boot, goggles) from the outside shops, but they cannot afford to buy all necessary equipment as they don’t have enough money. The only child workers who receive some protective equipment are cutter helpers. Their cutting masters usually provide them with their worn protective equipment like gloves, boots and helmets. However, these are most often in very bad condition and cannot be worn for a long time<sup>23</sup>.

Working barefoot in deep mud and without gloves, child workers said they are often cut by small steel pieces they cannot see. Even when they don’t get cut, their feet become painful. When they clean pieces from the sludge, the toxics cause skin diseases. Most workers are exposed to the scorching sun and heat all daylong without any shade or resting facility.

During cutting operations, the child workers told that the flames of the gas torches and iron sparks hit their eyes causing inflammation, redness and damage to their vision. When they clean the iron plates with a hammer, small pieces of rust get into their eyes. Without

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<sup>23</sup> Some adolescents buy their basic protection equipment from shops nearby the yards. In fact, these equipments are collected from the dismantled ships but the yard owners and contractors prefer to sell them outside without providing them to their workers.

protective equipment, fumes, dust, poisonous gases, and smells of burnt oils go into their body through inhaling and cause nausea, headache, intestine pain, chest pain, dark eye vision, dizziness and coughing. They cannot eat because of internal problems and pain in the chest or intestine. The drinking water is too polluted with metal and is not safe for intake. When the workers drink, they feel that they are drinking metal.

The occupational hazards mentioned above badly affect the body and mind of child workers. They cannot afford to buy foods for nutrition and medicine for treatment of illness and injuries. After longer periods of hard physical labour in risky and painful conditions, the children gradually lose their physical stamina, get easily sick, become weaker and a burden for all.

### ***6.3 Treatment for Injury and Sickness***

It was generally stated that the workers who are victim of an accident receive initial treatment for their injuries from the yard owners. However, the extent of treatment support that the workers get from the employers varies. A majority told that the yard owners provide initial emergency medical support, but rarely provide support to ensure the full recovery. Others said that the yard management only arranges transport to take the victim to hospital after the accident occurs. According to a few other respondents, the owners pay up to 50% of the treatment costs. Clearly, the yard management does not provide or arrange for the effective treatment for injured workers.

Although some workers get partial support from the owners for the treatment of injuries, no such support is provided for occupational illness. Invariably all respondents told that the yard owners do not care about the sickness of workers and do not provide necessary health service to them, such as periodic health check-ups. If a worker falls sick, he has to arrange everything for the treatment of his illness, i.e. go to the doctor, buy medicine etc.

Workers that fall into severe illness or are victim of an accident that leaves them with a serious injury, are sent back to their village home as soon as possible by the yard management, usually before the end of the treatment. Once back home, the onus of medical treatment falls on the suffering families. These workers become a burden for their families and often have difficulties in finding alternative employment due to their deteriorated health conditions.

## **6.4 Harassment**

The child workers interviewed stated that they are consistently insulted, bullied or harassed by the foremen, senior adult colleagues, supervisors or contractors for mistakes, slow movement or refusal to work when they are tired. The foremen and supervisors target the children who cannot keep up with the pace of adults. If a child worker refuses to carry a heavy piece of iron or is reluctant to do a risky task, he is harassed in various manners. The types of harassment that the children are exposed to at the yard are shouting, scolding, repeated threats of termination, withholding or delaying payment of wages, cutting off number of attendance or undue pressure to complete huge workloads quickly. In some cases, physical assault is also used against children; they are slapped or beaten up by the supervisor.

## **6.5 Working Contracts, Wages and Overtime**

Shipbreaking workers have no strengths to bargain with the employers about the conditions of their employment. No worker gets any written employment contract or identity card from the shipbreaking owners as proof of their recruitment. None of them can therefore claim the basic labour rights without such vital documents. There is no workers' register, wages register or leave register in any yard as per the Labour Rules. If someone is injured or is terminated or his wages remain unpaid and the yard authority refuses to recognize him as their staff, there is no proof to establish his attachment with the yard so as to claim his dues. Some respondents told that the workers are supplied with attendance card which they cannot keep with them after the working hour.

On an average, all workers, including the children, have to spend 10-12 hours a day at the yards, typically from 7 or 8 am. Some of them work even more, up to 14 hours daily. Most of the child workers work 20-25 days in a month. Some work 15-20 days and very few work 26 days in each month<sup>24</sup>. Of particular concern was the observation that the number of children working during night shift is much higher than those involved in day shift. Whilst a very small number of child workers were identified to be engaged in night work during 2008-09<sup>25</sup>, the involvement of child labour during night shift work in the yards has increased sharply over the previous years.

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<sup>24</sup> No child worker can work a full month once they are too tired, injured or sick and need to take rest at home due the nature of the job. Since the child workers feel weak and do not have much energy to work, they remain absent from the yard.

<sup>25</sup> "Childbreaking Yards: Child Labour in the Ship Recycling Industry in Bangladesh", FIDH, YPSA, NGO Shipbreaking Platform (2008) at p. 05, URL: <https://www.fidh.org/IMG/pdf/bgukreport.pdf>

Workers' wages are paid fortnightly calculated on daily hour basis<sup>26</sup>. In the majority of cases, wages are paid regularly and without delay although irregularities in payment is also evident in some cases. A good number of children told that they are not paid for overtime work, whereas, an equal number of them informed that they are paid for the extra hours of work. But the rate of overtime wages is quite low and inconsistent with the national labour law. The total monthly income of the children range between USD 70-100 and their daily pays range between USD 3-5. The child workers generally get much lower wages than the adults even though they work for equal hours.

Payment of yearly bonus to the workers is completely unknown. According to the labour law, the workers must be paid two festival bonuses in a year equal to two month's basic wages. But nothing is paid to the workers by the yard authority. Sometimes, a very nominal amount (USD 6-12) is handed to them as charity. This is also paid very irregularly. The child workers also do not get provident fund, group insurance, labour welfare grant or any other social security benefit from the yard owners. All respondents told that their wages and bonus are insufficient to meet the personal and family expenses.

### ***6.6 Leaves, Holidays, Family Reunion***

The child workers in shipbreaking yards cannot enjoy public holidays and paid leaves as per the labour law. Whilst the respondents informed that they were in most cases able to take leave, the leaves were only granted without payment. All the workers work on 'no work no pay' basis--the employer deducts money from their wages for every period of leave. Moreover, if a worker leaves the yard for some days, the owners simply recruit new workers to replace the absentee as there are no employment contracts signed. So, the fear of losing their job and reduction of earning prevents the children from returning home to see their family members. Due to these factors, the migrant child workers only go home two or three times in a year or after shipbreaking in their yard is completed.

### ***6.7 Living Condition of Child Workers***

The child workers live at different places of Sitakunda, Chittagong nearby the respective yards where they are employed. The yard authorities do not provide accommodation facilities for them. The children that have migrated from other parts of Bangladesh arrange their

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<sup>26</sup> Workers work on daily basis and their wages are paid on the basis of daily work. There is no pay for no work.

accommodation and foods at their own costs. They live in dormitory or shacks located next to the yards and are detached from their family members who remain in the village they left behind. They stay in small, shared rooms to cut-down living expenses. The migrant child workers live in very substandard conditions with no water supply, electricity, bathing or attached washroom facilities.

Some of the child workers, however, live with their family in surrounding villages nearby the yards. They are mostly local people living at the ancestral homestead although some of them are migrants from other districts.

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**Solaiman** (17) is a local boy from Kadam Rasul, Sitakunda. He lives with his parents and his young brother in their ancestral house close to the shipbreaking yard where he works. His sister is married and lives with her husband. Solaiman and his father are the earning members of the family. Solaiman studies at a local college in Commerce group at 11<sup>th</sup> grade. Solaiman's sick mother needs a lot of money for treatment of diabetes and it soon becomes impossible for his father to bear all the expenses alone. In order to manage the medical expenses, maintain educational costs of him and his younger brother and to provide income support to the family, Solaiman works in the nearby shipbreaking yard. His ambition is to complete a MBA and find a career in the banking sector. Solaiman has been working in the yard for one and half year. His monthly income is taka 6000. *"I mainly work in night shifts to attend classes and focus on study in daytime. Other occupations do not provide the opportunity for attending classes during the day. That's why I joined a shipbreaking job."*, Solaiman added. However, he cannot go to college regularly. He works on average 20 days a month. Due to the heavy pressure of work in the yard, he cannot manage enough time for his studies. This caused him to earn lower grade in his SSC (secondary school certificate) examination. His SSC result was not good. During his work in the yard, he never get safety equipment and also little water is provided by the yard management to reduce the dehydration from the body caused by working in overheat. Solaiman told that the management puts pressure on him to finish the work quickly and constantly gives him more workloads. Many times he does not have time for dinner. According to Solaiman, almost all child workers come to work in shipbreaking yards mainly due to family problems and all of them face identical problems during work. If they would get better alternative jobs, they will leave shipbreaking yards immediately.

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### **6.8 Contact with Trade Unions, Inspection Department and NGOs**

Trade unions keep distance from the child workers, and even seem to deny that there is a child labour problem in the shipbreaking sector. Indeed, some unionists we talked to tried to justify their non-engagement by claiming that there is no child labour at the shipbreaking yards. All

child workers whom we interviewed told that they do not get any help or support from the trade unions to get rid of their workplace problems. Also, foremen and adult workers alleged that trade union leaders do not work for the interests of workers. They maintain connivance with the yard authority and are not sincere about the issues of workers. They do not effectively raise their voice against clear violations of labour rights.

It is also obvious from our field experience that the labour inspection department (DIFE) lack concern about child workers in shipbreaking yards. The department has overlooked the child labour issues in this sector. The child workers have no perception of the inspection department as they had never come across any officer in their yards. DIFE claimed they have not found any evidence of child labour in any yard but stated that if they get credible information about the presence of child labour, they will take action<sup>27</sup>. It was alleged by many, the DIFE Inspectors do not meet or talk with general workers during inspections in the yard. Some local persons told that the shipbreaking owners are very influential and powerful and that is why the government lacks strict surveillance over them. The regulatory agencies have not taken any effective step against the yard owners for promoting worst forms of child labour in their establishments.

One representative from local NGO YPSA informed that they are seeking to reach out to more child workers and their parents to inform them about the harmful effects of shipbreaking work. They are also planning to educate the child workers. Sometimes, the technical training provided by YPSA to child workers for switching to alternative decent occupations could not drive all trainee children out of the hazardous shipbreaking job. Few of them returned to shipbreaking job again after the training. The main underlying reason is allurements of better payment, said the YPSA spokesperson<sup>28</sup>.

## **7. Conclusions**

There is no doubt that child labour still exists in the shipbreaking sector in Bangladesh. An estimated 13% of all shipbreaking workers are children (15-17 years) compared to 25% in

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<sup>27</sup> Interview with the deputy Inspector General (DIG) of the Department of Inspection for Factories and Establishments (DIFE), Chittagong Regional Office.

<sup>28</sup> YPSA runs a programme to train up the shipbreaking workers with life and technical skills for alternative jobs and better living, including child workers. It has so far provided technical training to 186 workers and life skill to 300 workers.

2008. Children below 15 years were not observed in any yard, and all children working in this sector that were interviewed are within 15-17 years age group. There has thus been progress from the earlier scenario as observed in 2008 where an estimated 25% of the workers were children, some of them younger than 10 years old.

According to both national and international legal standards, employment of children below 18 years in the shipbreaking yards is completely prohibited as it is considered a worst form of child labour. Continuous advocacy by local NGOs such as YPSA, spot checking by NGO Shipbreaking Platform and other stakeholders that work to stop child labour in shipbreaking yards have promoted government surveillance and increased media reporting. This has created pressure on the yard owners not to recruit under-18 children for shipbreaking. The number of recruited child workers has therefore been reduced sharply during the last few years. Whilst very young aged children (7-12 year) were seen in the yards 4-5 years ago, there seems at present to be no new recruitment of very young child workers.

No qualitative and meaningful improvement has, however, taken place during the last decade with regard to labour conditions in the yards, and child labour has not been abolished from the whole sector. Still, workers' lives, including children, are in great danger due to the persistence of severe occupational safety and health hazards, and ensuring decent working conditions for all remains a real challenge. Of particular concern is that the conditions for child workers seems to have worsened as more children now work during night shifts.

The role of shipbreaking yard owners and their association, the Bangladesh Ship Breakers and Recyclers Association (BSBA), in enforcing the relevant international and national legal standards is far from being satisfactory. Lack of stronger voice of media and civil society organisations, insufficient action by the labour administration and enforcement agencies to stop the fatalities caused by shipbreaking, non-compliance of labour and environmental standards, and lack of effective measures to eliminate child labour have left the shipbreaking workers in a very precarious state. For the yard owners, children unfortunately still represent a cheaper labour force that is easy to control. Indeed, they are most unlikely to defend their rights and organise into trade unions<sup>29</sup>.

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<sup>29</sup> FGD with YPSA staffs.



Violation of labour rights and shipbreaking laws in the yards cannot be stopped unless the DIFE, DOE, Ministry of Industry and other government authorities beef up their surveillance on shipbreaking operations. If they carry out effective monitoring in all the yards, decent working conditions will be ensured. The government and local administration have responsibility to annihilate poverty and effectively drive out child labour from shipbreaking yards. Rehabilitation, income safety and hazard-free employment should be ensured for the poor families. The existing adolescent workers should be brought out of the ultra-hazardous and unacceptable working conditions of shipbreaking yards and be relocated to non-hazardous jobs which are tolerable by them with regard to their health, safety and overall wellbeing.

## **8. Recommendations**

Children are the most vulnerable to accidents and diseases caused by the toxic and hazardous conditions at the yards. They are an easy target to exploit as they are less pre-cautioned and do not raise their voice against any violation of their rights. The involvement of under-aged workers in shipbreaking yards is a worst form of child labour which has to be eliminated urgently. The government should strengthen its drive for poverty reduction, social safety programme and create decent working environments. A national child labour elimination strategy should be adopted based on the national and international labour standards. This strategy should be executed through effective 'programme of actions' for dispelling child labour in the shipbreaking sector. The 'programme of actions' of the government should aim at ensuring following strategies to<sup>30</sup>:

- a. identify and denounce the worst forms of child labour;
- b. prevent the engagement of children in the worst forms of child labour or emancipate them from such situation;
- c. protect the child workers from reprisals;
- d. ensure their rehabilitation and social integration through measures which properly address their educational, physical and psychological needs; and
- e. raise voices of the affected children, their families and general public through information sharing and sensitization.

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<sup>30</sup> Article 2 of the Recommendation-190 (ILO Worst Forms of Child Labour Recommendation 1999)

## List of References

1. Aktar, S. and Abdullah, ASM (2013). Protecting child labour in Bangladesh: domestic laws versus international instruments. Bangladesh e-Journal of Sociology, 10:1, 153-172; URL: <http://www.bangladeshsociology.org/BEJS%2010.1Sharmin%20Aktar%20.pdf>
2. "Bangladesh Household Income and Expenditure Survey 2016-2017", Bangladesh Bureau of Statistics (BBS); URL: <http://catalog.ihsn.org/index.php/catalog/7399/datacollection>
3. "Child breaking Yards: Child Labour in the Ship Recycling Industry in Bangladesh", FIDH, YPSA, NGO Shipbreaking Platform (2008); URL: <https://www.fidh.org/IMG/pdf/bgukreport.pdf>
4. "Child Labour Survey Bangladesh 2013", Bangladesh Bureau of Statistics, October 2015; URL: [www.bbs.gov.bd/site/page/111d09ce-718a-4ae6-8188-f7d938ada348/লেবার-এন্ড-ইমপ্লয়মেন্ট](http://www.bbs.gov.bd/site/page/111d09ce-718a-4ae6-8188-f7d938ada348/লেবার-এন্ড-ইমপ্লয়মেন্ট)
5. ILO (2012), « What is Child Labour », Geneva; URL: [www.ilo.org/ipec/facts/lang--en/index.htm](http://www.ilo.org/ipec/facts/lang--en/index.htm)
6. ILO Minimum Age Convention, 1973 (No. 138); URL: [www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C138](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C138)
7. ILO Worst Forms of Child Labour Convention, 1999 (No. 182); URL: [www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:C182](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:C182)
8. ILO Worst Forms of Child Labour Recommendation, 1999 (R-190); URL: [www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100\\_ILO\\_CODE:R190](http://www.ilo.org/dyn/normlex/en/f?p=NORMLEXPUB:12100:0::NO::P12100_ILO_CODE:R190)
9. ILO 19th International Conference of Labour Statisticians (2013); URL: [www.ilo.org/wcmsp5/groups/public/-/dgreports/-/stat/documents/publication/wcms\\_220535.pdf](http://www.ilo.org/wcmsp5/groups/public/-/dgreports/-/stat/documents/publication/wcms_220535.pdf)
10. ILO (2000) "Occupational Safety and Health in Bangladesh", URL: [www.ilo.org/wcmsp5/groups/public/-/ed\\_protect/-/protrav/-/safework/documents/policy/wcms\\_187745.pdf](http://www.ilo.org/wcmsp5/groups/public/-/ed_protect/-/protrav/-/safework/documents/policy/wcms_187745.pdf)
11. The Bangladesh Labour Act 2006 (XLII of 2006), Government of Bangladesh; URL: [https://mole.gov.bd/site/view/legislative\\_information/আইন-ও-বিধিমালা](https://mole.gov.bd/site/view/legislative_information/আইন-ও-বিধিমালা)
12. SRO NO 65-LAW/2013; issued by the Ministry of Labour and Manpower, Government of Bangladesh in pursuance of section 40(3) of the Labour Act 2006. ; Also, ILO (2014), "Compendium of hazardous child labour lists and related legislation for Bangladesh," ; URL : [http://www.ilo.org/ipec/Informationresources/WCMS\\_382487/lang--en/index.htm](http://www.ilo.org/ipec/Informationresources/WCMS_382487/lang--en/index.htm)
13. The Bangladesh Labour (Amendment) Act, 2013. The Government of Bangladesh; URL: [https://mole.gov.bd/site/view/legislative\\_information/আইন-ও-বিধিমালা](https://mole.gov.bd/site/view/legislative_information/আইন-ও-বিধিমালা)
14. The Bangladesh Labour (Amendment) Act 2018; URL: [https://mole.gov.bd/site/view/legislative\\_information/আইন-ও-বিধিমালা](https://mole.gov.bd/site/view/legislative_information/আইন-ও-বিধিমালা)
15. The National Child Labour Elimination Policy 2010. Government of the People's Republic of Bangladesh; URL: <https://mole.gov.bd/site/view/policies/নীতিমালা>
16. The Children Act 2013. The Government of Bangladesh; URL: [www.ilo.org/dyn/natlex/natlex4.detail?p\\_lang=en&p\\_isn=94284&p\\_country=BGD&p\\_count=137&p\\_classification=04&p\\_classcount=8](http://www.ilo.org/dyn/natlex/natlex4.detail?p_lang=en&p_isn=94284&p_country=BGD&p_count=137&p_classification=04&p_classcount=8)
17. The UN Child Rights Convention 1989; URL: [www.unicef.org/au/Upload/UNICEF/Media/Our%20work/childfriendlycrc.pdf](http://www.unicef.org/au/Upload/UNICEF/Media/Our%20work/childfriendlycrc.pdf)