

Reply to the direct request–

Minimum Age Convention, 1973 (No. 138) - Greenland

Article 1 of the Convention. National policy. The Committee notes that there is no information in the Government's report regarding national policies adopted with a view to preventing or eliminating child labour in the country. *The Committee requests the Government to provide information on the measures taken or envisaged to adopt a national policy or action plan for the elimination of child labour.*

Answer:

In Greenland, the Working Environment Authority's Executive Order No. 1347 of 15th December 2005 is in force. The Greenland Employment Strategy 2026 – 2035 will include a special focus area regarding youth employment. This will include an information campaign about the regulations, so that the business community is aware of the general regulations regarding employment of all persons under the age of 18.

Article 2(1). Scope of application. The Committee notes that section 2(1) of the Greenland Working Environment Act (WEA) provides that its provisions apply only to work done for an employer. Moreover, in accordance with section 3(3) of the WEA, its provisions apply to the shipping and fishing industries only as regards loading and unloading of ships and shipyard work carried out on board of ships, including fishing vessels. *The Committee requests the Government to provide information on the manner in which the protection provided by the Convention is guaranteed to children and young persons who work on their own account. In addition, it requests the Government to indicate the measures taken or envisaged to ensure that the protection of the Convention is extended to children and young persons who work in the fishing industry in tasks not related to the loading or unloading of ships or to shipyard work. It requests the Government to provide information on the progress made in this regard.*

Answer:

Greenland follows the Danish Labour Inspectorate's Executive Order on minimum protection of certain categories of persons on ships. Announcement no. 722 of 8th June, 2017 § 5. No one under the age of 16 may work or perform tasks on board a ship. Greenlandic vessels are obliged to send the crew list to the Danish Maritime Authority. The Greenland Government recognises that there is a need to disseminate knowledge about young people and employment. Therefore, the Greenland Government shall work on an information campaign about the types of work that young people can do and which tasks they are not allowed to do. The information campaign shall be based on the Danish Labour Inspectorate's executive order on the work of young people in Greenland.

Article 2(1) and (3). Minimum age for admission to employment or work and age of completion of compulsory schooling. The Committee notes that, in accordance with the minimum age for employment or work specified by Greenland, section 46(2) of the WEA provides that children under the age of 15, or who are subject to compulsory education, shall not perform work.

The Committee observes, however, that according to the website of the Nordic Co-operation, all children between the ages of 6 and 16 in Greenland must receive education for 10 years. The Committee recalls that, in accordance with *Article 2(3)* of the Convention, the minimum age for admission to employment or work must not be lower than the age of completion of compulsory schooling. If the minimum age for admission to work or employment is lower than the school-leaving age, children may be encouraged to leave school as children required to attend school may also be legally authorized to work (General Survey on the fundamental Conventions, 2012, paragraph 370). *The Committee requests the Government to indicate the legal provisions providing for the age of compulsory schooling in Greenland, and to communicate a copy of said legislation with its next report. If the age of completion of compulsory schooling is indeed 16 years of age, the Committee requests the Government to take measures to raise the general minimum age of admission to employment or work to 16 years.*

Answer:

The legal basis for compulsory education in Greenland is the Government's Executive Order No. 19 of 27th April 2023 on primary school. Section 29.- Section 34. Education begins in the 6th year of the child's life and lasts for 10 years. Working hours, etc. for young people aged 13-15 or the group covered by compulsory education are protected in the Executive Order on the Work of Young People in Greenland. The Danish Working Environment Authority's Executive Order No. 1347 of 15th December 2005:

Section 32. The daily working hours for young people aged 13-15 or who are covered by compulsory education may not exceed 2 hours on school days and 7 hours on days other than school days. When the daily working hours are 7 hours, they must be total. Subsection 2. The total weekly working hours may not exceed 12 hours in weeks with school days and 35 hours in weeks other than school weeks. Subsection 3. However, young people who have reached the age of 15 but are still subject to compulsory education may work for 8 hours on days other than school days and 40 hours in weeks that are not school-free. When the daily working hours are 8 hours, they shall be total.

Section 33. Young people who are subject to compulsory education but who have been granted permission to fulfil the compulsory education by participating in vocational training or employment may work for up to 8 hours per day and 40 hours per week. The same applies to young people who are in vocational training, cf. Section 30.

Section 34. The total working hours for young people who are under 15 years of age but are not subject to compulsory education may not exceed 7 hours per day and 35 hours per week.

§ 35. §§ 18-20 apply correspondingly to young people aged 13-15 or who are subject to compulsory education. Evening and night work § 36. Young people aged 13-15 or who are subject to compulsory education may not work between 8:00 p.m. and 6:00 a.m. Rest period

§ 37. Young people aged 13-15 or who are subject to compulsory education must have a continuous rest period of at least 14 hours per day. Day off § 38. Young people aged 13-15 or who are subject to compulsory education must have 2 continuous days off within each week.

Subsection 2. If it is not possible to combine the two days off, one day off must immediately follow a daily rest period. Subsection 3. One of these days off shall normally include Sunday.

Holidays § 39. Young people who are subject to compulsory education shall, as far as possible, have a complete period free of work during the school summer holidays.

Article 3(1). Minimum age for admission to, and determination of, hazardous work. The Committee notes that section 46(3) of the WEA provides that the Minister of Employment (MoE) may adopt rules concerning the employment of young persons, including setting a higher age limit for specific types of work with a view to ensuring that it is performed in a safe and healthy manner. In this regard, the Committee takes due note of chapter 3 of the announcement No. 1347 of 15 December 2005 on the work of young persons (Executive Order), which lays down rules on certain forms of work which may not be performed by young persons under the age of 18 years, as well as of Annexes 1, 4 and 6, which provide for detailed lists of types of tools, installations, work processes, substances and materials, and activities in which, and with which, young persons under the age of 18 may not be engaged or involved.

Article 3(3). Authorization to carry out hazardous work from the age of 16. The Committee notes that sections 10 and 11 of the Executive Order contain exceptions to the rule whereby hazardous work should be prohibited to young persons under the age of 18. Section 10, referring to Annex 2 of the Executive Order, provides that young persons aged over 16 years may perform certain types of hazardous work related to agriculture/horticulture and the use of rifles and knives in connection with hunting and trapping. The Committee observes that sections 10 and 11 of the Executive Order also allow children over the age of 15 and who are not subject to compulsory education to perform the types of hazardous work listed in Annexes 3, 4 and 5 of the Executive Order.

The Committee notes that the Executive Order contains provisions regarding the requirements of safety, training and supervision necessary to allow young persons to perform hazardous work, including within sections 10 and 11 themselves. The Committee recalls, however, that *Article 3(3)* of the Convention allows an exception to the prohibition of dangerous work to young persons only *from the age of 16 years*, on condition that their health, safety and morals are fully protected and that they have received adequate specific instruction or vocational training in the relevant branch of activity. *The Committee therefore requests the Government to take the necessary measures to ensure that only young persons from the age of 16 years are authorized to carry out such work, in accordance with Article 3(3) of the Convention.*

Answer:

It is not correct that young people over 16 years of age are allowed to perform hazardous work. Young people under 18 are protected under Appendix 4 to the Danish Labour Inspectorate's Executive Order No. 1347 on the Work of Young People.

Article 6. Vocational training and apprenticeships. The Committee notes that, under section 9 of the Executive Order, children from the age of 15 years are allowed to perform the types of

hazardous work listed in sections 10(1) (referring to Annex 1), 11(1) (Annex 4), 14 (working in or near mines, work involving a risk of falling) and 15 (Annex 6), when the work performed forms part of vocational training regulated by law, or is carried out after completion of training insofar as it is necessary for the young person’s employment in the profession. The Committee recalls that, in accordance with *Article 6* of the Convention, while work done in the course of vocational training or apprenticeship is not covered by the provisions of the Convention, this relates only as regards the minimum age requirement; the requirements of *Article 3* of the Convention, regarding protection from hazardous work, remain applicable to all children and young persons, including those engaged in vocational training or apprenticeships (General Survey on the fundamental Conventions, 2012, paragraph 385). *The Committee therefore requests the Government to indicate the measures taken or envisaged to ensure that young persons below the age of 16 years engaged in vocational training or apprenticeships do not undertake hazardous work.*

Answer:

There are no special rules that protect young people under 16. This may be because they do not exist. The youngest apprentices are 16 years old and there are not many of them annually:

	16-year-old apprentices distributed by year												
	2012	2013	2014	2015	2016	2017	2018	2019	2020	2021	2022	2023	2024
Number of apprentices	3	5	2	5	2	7	5	3	7	3	5	9	6

Source:

Working hours or conditions are something that is negotiated between various authorities and the social partners. In SIK's collective agreement regarding apprentices and students, the employer is obliged to ensure safety. The employer must provide safety clothing free of charge, which must be used by apprentices for safety reasons.

Article 7(1) and (3). Minimum age for admission to, and determination of, light work. The Committee notes that Chapters 5 and 6 of the Executive Order lay down the rules for the engagement of children aged 13 to 15 in light work, including the number of hours permitted, the prohibition of night work, and the provision of rest periods. It also takes due note section 29 of the Executive Order, which provides that children between the ages of 13 and 15 may be engaged only in the types of light work listed in Annexes 7 and 8, and as long as the work involved does not endanger their safety and health.

Article 8. Artistic performances. The Committee notes that Chapter 7 of the Executive Order lays down the rules regarding the employment of children in cultural or similar activities. It notes that, in order for children under the age of 13 to participate in such activities, including sporting events, theatre plays, music concerts, circus performances, radio and television, or the recording of films or commercials, permission must be granted in each individual case by the Chief of Police. Such permission must state the time of day during which the child can be employed, so that the child has sufficient rest and the possibility of minding the schooling. However, according to section 42 of the Executive Order, no special permission is required for children over the age of 13. *The Committee requests the Government to take measures to ensure that all children under the minimum age for admission to employment or work,*

namely 15 years, are subjected to the requirement of obtaining a permit by the Chief of Police in order to be authorized to participate in any type of artistic performances, in accordance with Article 8 of the Convention.

Answer:

It is not correct that young people over the age of 16 are allowed to perform hazardous work. Young people under 18 are protected under Appendix 4 to the Danish Labour Inspectorate's Executive Order No. 1347 on the work of young people.

Article 9(1). Penalties. The Committee notes that the rules on penalties for violating the provisions of the WEA or the Executive Order relating to the employment of children can be found in Chapter 14 of the Act and in section 54 of the Executive Order. Violations of the provisions of both these laws are punishable in accordance with the Greenland Criminal Code. Both these laws provide that it is considered a particularly aggravating circumstance if any injury has been caused to the life or health of young persons under the age of 18 or if there has been a risk of such an occurrence. Further, the parents or guardians may be held liable to a fine if the work is carried out by their child or ward with their knowledge (section 69 of WEA; section 54(7) of the Executive Order). *The Committee requests the Government to provide information on the application in practice of these provisions of the WEA and Executive Order, in particular the number and nature of penalties imposed with regard to the employment of children and young persons.*

In 2024, the Greenland Labour Inspectorate¹ recommended that charges be brought in 4 cases. However, there is no definition of what the case encompasses, so it cannot be said whether it is in connection with the employment of children and young people.

Article 9(3). Keeping of registers. The Committee notes that section 17(1) of the WEA provides that employers shall keep registers in accordance with the rules laid down by the MoE. It observes that there is no other information in the Government's report regarding any legislation prescribing the obligation that employers keep registers of all workers under the age of 18. *The Committee requests the Government to indicate whether any rules were adopted by the MoE pursuant to section 17(1) of the WEA requiring employers to keep registers of all persons employed under the age of 18, in conformity with Article 9(3) of the Convention. If such rules do not exist, the Committee requests the Government to take measures to ensure their adoption in the near future.*

Answer:

It is true that children under the age of 13 are not allowed to work. However, they may perform professionally, participate or contribute to cultural or similar activities, e.g. film or theatre, if permission has been granted.

¹ Source [Årsrapport 2024 – Arbejdstilsynet](#) page 3.

The Danish Working Environment Authority has taken over the processing of ongoing applications as of 1 January 2025.

Work and cultural events cannot be set against each other in this way. Physical activity in group activities are healthy for children.

The Greenland Government respects the recommendations of the National Board of Health for physical activity for children and young people (5-17 years). and these are:

Be physically active for at least 60 minutes a day. The activity must be of moderate to high intensity and be in addition to ordinary short-term everyday activities. If the 60 minutes are divided, each activity must last at least 10 minutes. At least three times a week, high-intensity physical activity of at least 30 minutes must be included to maintain or increase fitness and muscle strength. Activities that increase bone strength and mobility must be included. Physical activity beyond the recommended amount will bring additional health benefits.

Application of the Convention in practice. The Committee notes the Government's information that the Danish Working Environment Authority, which is an agency under the Danish MoE, carries out the labour inspections and controls compliance with legislation on young persons' work. According to the report of the Government, in the period covered (February 2021–April 2022), the Working Environment Authority has not issued notices regarding young persons' work but issued four written guidance reports. The Committee also notes the statistics provided by the Government on the number of persons aged 15 to 19 who were employed between 2017 and 2020 (3,325 in 2020). The Government indicates, however, that statistics regarding young persons aged 13 to 15 are not available. *The Committee requests the Government to continue to provide updated statistical information on the nature, extent, and trends of child labour, indicating the sectors of economic activity where child labour is more prevalent, as well as information on the number and nature of infringements reported by the Danish Working Environment Authority.*

The Ministry of Labour in Greenland has been in dialogue with Statistics Greenland on the subject. Data covering statistics regarding 13-15 year olds can be expected in the near future.

VI.

Workers' and employers' organisations which have received a copy of this report:

- Greenland municipalities:
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