



MINISTRY OF LABOUR AND SOCIAL PROTECTION
DIRECTORATE OF OCCUPATIONAL SAFETY
AND HEALTH SERVICES

NATIONAL LIST OF HAZARDOUS WORK PROCESSES FOR
PERSONS UNDER THE AGE OF EIGHTEEN (2025)

I: Introduction

Kenya has ratified both International Labour Organization (ILO) Conventions—C138 (Minimum Age Convention, 1973) and C182 (Worst Forms of Child Labour Convention, 1999). To fully implement these conventions, it is essential to update the national list of hazardous work processes to which children may be exposed.

This document presents a comprehensive overview of the revised Hazardous Work List for children in Kenya. It reflects current labour market dynamics, occupational safety and health risks, and aligns with both national legislation and international standards. The revision emphasizes the need to harmonize domestic policies with global frameworks, including ILO conventions and relevant Kenyan laws, to uphold children's rights and ensure their protection across diverse work environments. It also accounts for evolving socio-economic conditions, technological advancements, and emerging forms of labour—particularly within the digital economy.

Beyond enumerating specific hazardous activities across various sectors, the document outlines the process of integrating these provisions into Kenya's legal framework. It underscores the importance of public participation, stakeholder engagement, and continuous monitoring to ensure effective enforcement of labour laws and the promotion of safe working conditions for children.

The list reaffirms Kenya's commitment to eliminating hazardous child labour through legislative reform, awareness initiatives, and coordinated institutional action—advancing the nation's efforts to safeguard the well-being of its children.

II. National list of Hazardous Work Processes for Persons under Eighteen Years in Kenya

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
1	Agriculture	Cash Crop /Subsistence farming	Crop husbandry	Ploughing, tilling, planting, weeding, spraying, fertilizer application, pruning, harvesting, animal scaring, transport and storage	Chemicals (toxic, carcinogens), physical (dust, noise, extreme temperatures, radiation, vibration, animal bite, falls), ergonomics (heavy lifting, prolonged standing), mechanical, psychosocial, biological (allergens, pathogens)
		Horticulture	Crop husbandry	Ploughing, bed making, planting, weeding, spraying, fertilizer application, pruning, harvesting, storage	Chemicals, physical (dust, noise, extreme temperatures, radiation, vibration), ergonomics (awkward postures, prolonged standing, heavy lifting), mechanical (tools and equipment, entanglement, struck by machine, crushing)
		Livestock	Animal Husbandry	Milking, herding, spraying, slaughter, dung waste management	Biological (pathogens, parasites), psychosocial (banditry, defilement), physical (heat stress, radiation, adverse weather, dust snake bites, animal attacks), chemical (acaricides)
		Aquaculture	Fishing, fish farming, hydroponics	Deep sea/lake fishing, breeding, harvesting, feeding, boat riding, slaughter, descaling, sorting, drying, storage, manual handling.	Physical (fumes, cold storage, adverse weather, radiation, snake bites, animal attacks), Ergonomics (manual handling), biological (STIs) drowning, chemical, psychosocial (sexual exploitation)
		Forestry	Logging, agroforestry	Planting, axing, sawing, splitting, ferrying logs,	Physical (falling trees, dust, fumes, noise, heat, vibration, bites and stings, animal

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
				firewood collection, bush clearing	attacks), ergonomics (manual handling), chemicals, biological (stinging nettle, pathogens), mechanical (tools and equipment, entanglement)
		Ethnobotanical extraction and apiculture	Bee keeping, natural extracts	Gum harvesting, honey harvesting, spice extraction, herbal medicine extraction	Physical (heat, falls from height, insect bites, pricks), chemical (irritants), biological (pathogens, allergens), mechanical (tools and equipment)
2	Industrial Undertakings	Processing, manufacturing	Machinery operation, chemical handling	Chemical mixing, milling, packaging, waste collection, loading and offloading	Physical (fire, noise, vibration, dust, fumes, mists), chemical, psychosocial, mechanical (tools and equipment), ergonomics, biological (pathogens)
		Micro, Small and Medium Enterprises (MSMEs)	Machinery operation, Chemical handling	Chaff cutting, black smithing and foundry, jaggery production, posho milling, fruit processing, panel beating, loading and offloading	Physical (fire, noise, vibration, dust, fumes, mists,) chemical, psychosocial, mechanical (tools and equipment), ergonomics, biological (pathogens)
		Tannery	Hides and skin processing	Skinning, scraping, drying, tanning (soaking, liming), lifting, waste disposal	Physical (fur/dust, cuts, pricks), biological (pathogens, allergens) chemical (corrosives), mechanical (tools and equipment), ergonomics, psychosocial (obnoxious odours)
3	Construction	Building operations	Brick and block making, masonry, carpentry,	Stone cutting, block moulding, manual handling, mortar and concrete making, curing,	Ergonomics (heavy lifting, repetitive movements) physical (noise, vibration, dust, falls, adverse weather, radiation), chemical (paints, cement), psychosocial (pressure to

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
			plastering, painting	shuttering, tiling, landscaping, waste handling, manual excavation, painting	meet productivity targets, fatigue, drug and substance abuse) Mechanical (machinery, tools and equipment)
			Demolition	Dismantling, Material hauling, site cleaning (sweeping)	Physical (falling objects, pricks, dust, noise) mechanical (equipment), ergonomics (heavy lifting, over exertion)
		Works of Engineering	Road construction, bridge construction	Steel fixing, machine operation, painting, asphalt mixing, bitumen heating, blowing	Physical (falling objects, pricks, dust, noise, adverse weather, heat) mechanical, ergonomics (heavy lifting, over exertion), chemical (bitumen, cement, paint)
4	Energy	Biomass energy	Charcoal burning, briquette making, dung and/or firewood collection.	Burning, pressing, crushing, drying, packaging selling	Biological (pathogens), chemical, psychosocial (lone working, violence and bullying), ergonomics (manual handling), physical (wild animals attacks, extreme temperatures, snake bites)
5	Tourism and Hospitality	Hotel and restaurant, entertainment	Porter, guide and aide services	Carrying luggage, beach attendants, dish washing, advertising, gambling	Biological (contaminated linen), psychosocial (harassment, sexual exploitation, morality, alcohol and substance abuse), chemical (detergents), physical (adverse weather, slips and trips), ergonomic
			Housekeeping	Room cleaning and laundry,	Chemical (detergents), physical (dust, cuts), mechanical, biological (allergens)
			Landscaping, Grounds maintenance	Sweeping, trimming, watering,	Mechanical (tools and equipment), physical (fall from height, dust, noise), biological (pathogens)

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
			Pool maintenance	Chlorination and disinfection,	Chemical (corrosives), physical (drowning)
		Tour and safaris	Transport, game drives, camping, nature walks	Carrying luggage, riding, guiding, nature walk, mountain climbing, cooking, tent erection /	Physical (wild animals attacks, adverse weather, fire), Psychosocial (language barrier, sexual harassment, exploitation, alcohol and drug abuse) ergonomics (long working hours, exertion)
6	Extractives	Quarrying	Stone cutting, stone crushing, drilling, excavation	Site clearing, excavation, cutting, manual handling, loading/offloading	Physical (noise, heat, dust, trips and slips) ergonomics (repetitive movements, heavy lifting), psychosocial (exploitation) , mechanical (tools and equipment)
		Sand harvesting	Shoveling, turnboy services	Filtering/sieving, excavation, loading and offloading, choking of sand trucks	Physical (silica dust, animal attacks, Road traffic accidents), ergonomics (bending, prolonged standing, repetitive movements), mechanical (tools and equipment), psychosocial (harassment)
		Artisanal mining	Extraction	Manual excavation, pitting, ore extraction crushing, sluicing, gravity separation, leaching, amalgamation, heating and recovery, sun drying, waste disposal	Chemical (mercury, cyanide, lime), physical (dust, heat, noise, adverse weather), ergonomics (manual handling, heavy lifting, repetitive movements), Psychosocial (exploitation), confined space hazards.
		Salt Harvesting	Panning, shoveling, material hauling	Excavating, evaporating, crushing, loading and offloading	Physical (heat, slips and falls, skin irritation, glare, dust) chemical (corrosion), Mechanical), ergonomics (heavy lifting)
7	Digital space Digital highway	Content creation and editing	Hazardous Video and	Photography, Online working, AI training (Large Language Model),	Psychosocial (cyber bullying/ exploitation, violence, drug and substance abuse, cognitive disturbances), physical (light,

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
			audio creation and editing	film creation (those that are violent, sex and nudity, embrace drug and substance abuse, vulgar language, betting and horror/occult)	noise) chemicals (harmful cosmetic and dyes), ergonomics (eye strain, poor posture)
8	Transport	Road	Public transport (matatu, bodaboda), animal carts	Loading and offloading, pushing and pulling carts and trolleys, touting	Psychosocial (bullying, exploitation, harassment, violence), ergonomics (heavy lifting), physical (fumes, noise, heat, Road Traffic Accident), mechanical (trips and slips)
		Water	Boat riding	Touting, loading and offloading	Physical (drowning, capsizing, adverse weather), biological (animal attacks), mechanical
9	Commercial Services	Informal services	Begging, hawking, street vending, running errands, Commercial sex	Soliciting, begging by intimidation, Trickery, hairdressing and modelling	Psychosocial (exploitation, sexual harassment, defilement), physical (adverse weather conditions, noise), ergonomics (poor posture, prolonged standing), chemical (cosmetics and dye)
10	Culture and recreation	Sports, arts and entertainment	Artisanal craft, Cultural Heritage Preservation	Dancing and acrobatic activities between 6:30pm to 6:30am in entertainment joints, Stone carving, artefacts making, betting, drug peddling, weaving, bullfighting and animal racing	Physical (slips and falls), biological (pathogens), psychosocial (bullying, harassment, sexual exploitation), ergonomics (repetitive tasks, over stretching)

	SECTOR	SUBSECTOR	ACTIVITY	WORK PROCESS	HAZARD CATEGORY (INCLUDES BUT NOT LIMITED TO)
11	Household Services	Domestic Work	Housekeeping , gardening, caregiving	Cleaning, washing, cooking, babysitting, taking care of the elderly and the sick, taking care of pets	Ergonomics (manual handling, repetitive movements, long working hours), psychosocial (exploitation, harassment, defilement), chemicals (cleaning detergents), physical (trips and slips), Biological (pathogens)
12	Waste Management	Waste processing Solid waste Liquid effluent	Waste picking, loading and offloading, machine operations, scavenging, working in landfills	Waste collection, sorting, burning, scrap metal collection, recycling, upcycling, storage, loading and offloading, heating, moulding, crushing, segregation, reclaiming usable materials and articles from garbage.	Biological (pathogens), chemical (toxic), physical (cuts, pricks, noise, vibration, dust), psychosocial (stigma, exploitation, drug and substance abuse), ergonomics (lifting, bending), mechanical (tools and equipment)

III: The review process and rationale for the inclusion or exclusion of specific activities.

There exist International and National instruments that prohibit child labour. Kenya has domesticated some of these International Instruments that include ILO C138, C182 and C190 as well as the recommendations and protocols that are associated with them. The National legislative frameworks are The Constitution of Kenya 2010, Children Act 2022, Employment Act 2007, Occupational Safety and Health Act 2007, Employment (General) Rules (Fourth Schedule) 2014, Counter Trafficking in Persons Act 2010, and Basic Education Act 2013.

Additionally, policies and plans including National Policy on Elimination of Child Labour, (2015), National Children Policy (2010), National Plans of Action to Tackle Online Child Sexual Exploitation and Abuse (2022 - 2026), Vision 2030, County Integrated Development Plans (CIDPs), National Education Support Program 2013-2018, National Child Protection Systems for Children (2011), are among some of the instruments that addresses child labour and exploitation.

The review process entailed desk review of the aforesaid legal instruments together with economic, social, cultural work activities and emerging issues such digital and communication dynamics in Kenya.

The Legislative instruments that have been mentioned above provide for the preservation of the rights of a child in terms of protection of their childhood.

Kenya is a member state of ILO and upholds rule of law. It is prudent that such a list is developed to be used alongside the International and National instruments. This list will amplify the substance in the laws and policies that are in operation within the country.

The list that has been developed constitutes the activities that are deemed to be hazardous to children in the sectors. Several of the activities outlined above, though prohibited by law, remain notably prevalent within the Kenyan context. Their inclusion or exclusion in the list was therefore guided by the extent to which they are commonly practiced in the world of work across the country.

IV: Roadmap for integration of the List into the National legislative frameworks, ensuring legal recognition and enforceability

a) Public participation

Upon finalization of the revised list, a notice for public participation shall be placed in two daily newspapers of nationwide circulation and key stakeholders' websites. All stakeholders including the Employers, Workers, and the members of the public will be requested to submit their views on the revised Hazardous work list. Comments, in a prescribed template will be received within 28 days.

b) Finalization of the Hazardous list

The drafting team will incorporate the comments in a workshop in the first quarter of 2026 and thereafter subject it to a stakeholders' validation.

c) Integration of list into Legislative frameworks

The comments of the public and including key stakeholders will be incorporated into the list which will be integrated into the following legislations and Regulations: -

- i) The Occupational Safety and Health Act, 2007
- ii) The Employment (General) Rules, LN 28 of 2014
- iii) The Children Act, 2022

In conclusion, the roadmap is critical in fast tracking incorporation of the revised Hazardous Work List into existing laws, regulations, and institutional mechanisms governing child labour and occupational safety. This is essential to ensure coherence, enforceability and sustainability of national interventions. The alignment will not only strengthen the legal and policy frameworks but also enhance institutional coordination, compliance monitoring and accountability mechanisms.

V: Dissemination and awareness of the Hazardous List

The Ministry of Labour and Social Protection will spearhead the dissemination and awareness-raising plan for the revised Hazardous Work List. This initiative will be executed partly through routine workplace visits conducted by inspectorate departments and through collaboration at both national and county levels with key stakeholders including employers, workers' organizations, and relevant government agencies as enumerated below:-

a) Stakeholders

1. National government –

- Ministry of Labour and Social Protection
- Ministry of Gender, Culture and Children Services, State Department for Children Services
- National Police Service
- Office of the Director of Public Prosecution
- Ministry of Education
- Ministry of Health
- National Government Administrative Office
- The Attorney General

2. Council of Governors. For each County Government –

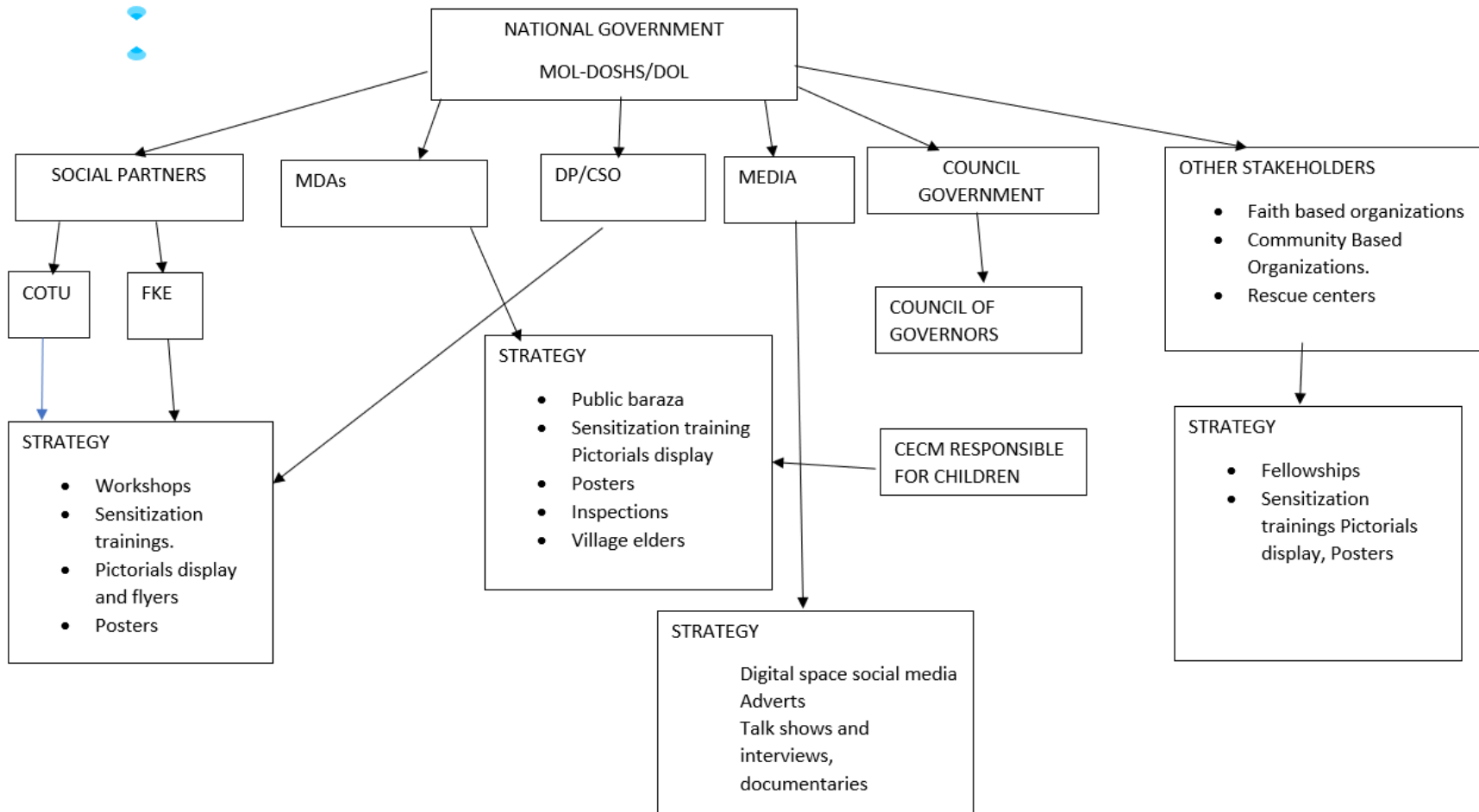
- Gender and Youth Department
- CEC responsible for children
- CEC responsible for education

3. Workers' organization- Central Organization of Trade Unions, Kenya (COTU-Kenya)

4. Employers' organization - Federation of Kenya Employers (FKE)

5. Civil Societies - Children protection agencies, Rescue centers, Non-Governmental Organizations, and Faith Based Organizations.

6. The Media



Awareness dissemination strategy chart

By engaging stakeholders across these levels, the plan aims to maximize its reach and effectiveness, promoting widespread understanding and compliance with the revised Hazardous Work List.

VI: Monitoring and Evaluation

Continuous monitoring and evaluation exercises will be undertaken from time to time to ensure that the following activities are effectively undertaken: -

- a) Legislative Reform by amendment of relevant statutes to incorporate the revised list.
- b) Awareness Campaigns to educate communities and employers on prohibited child labor practices.
- c) Institutional Coordination through strengthening collaboration among labour, social protection, education, and child welfare agencies.
- d) Establishment of systems for tracking child labour trends and evaluating policy impact.
- e) Implementation of the dissemination and awareness plan.

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