

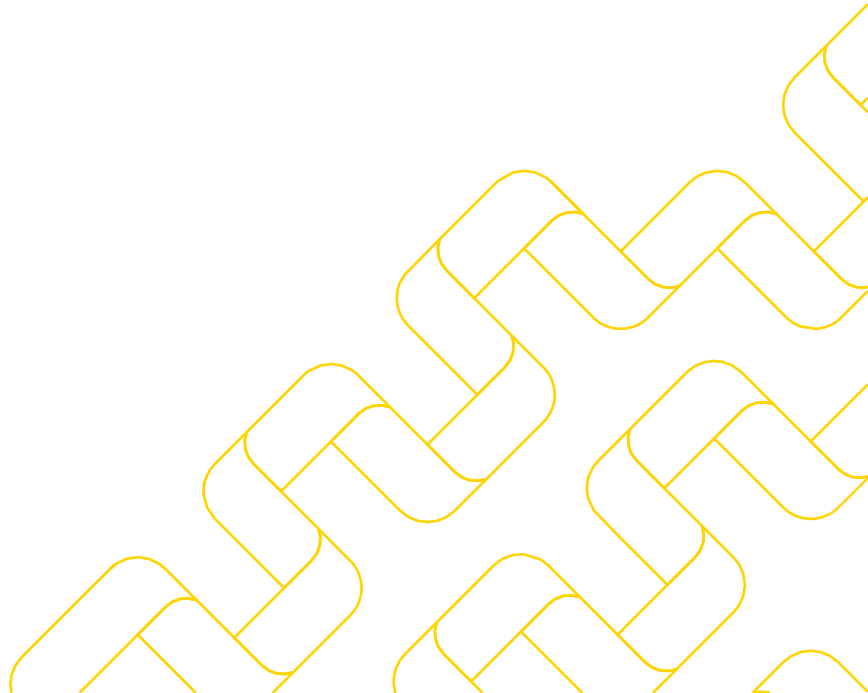


DALHOUSIE
UNIVERSITY

**Fighting Against Forced Labour and Child
Labour in Supply Chains Act (S.C. 2023, c. 9)**
2023-2024 Fiscal Year Report

Original submitted on May 31, 2024

Revised version approved June 25, 2024



This report is filed on behalf of Dalhousie University (“**Dalhousie**” or the “**University**”) in accordance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, S.C. 2023, c. 9 (the “**Act**”). Pursuant to section 11 of the Act, this report details the steps taken by the University during its previous financial year to prevent and reduce the risk that forced labour or child labour is used at any step in the production of goods in Canada or elsewhere by the University or of goods imported into Canada by the University. The report was approved by Dalhousie’s Board of Governors on June 25, 2024. This revised report is filed for the University’s April 1, 2023 – March 31, 2024, fiscal year.

I. Structure, Activities and Supply Chains

Structure

Legal Name:

Dalhousie University

Background and Mandate:

Founded in Halifax, Nova Scotia, in 1818, Dalhousie is Nova Scotia’s leading research-intensive university, offering educational degrees across 13 diverse faculties. Dalhousie’s mission is to lift the intellectual, social, and economic vitality of its local, national, and global communities through an institution-wide commitment to a world-class student experience, interdisciplinary collaboration, and mutual respect and inclusion in all aspects of its academic, research, and civic priorities.

Dalhousie has three campuses located in Halifax, Nova Scotia, an Agricultural Campus located in Bible Hill, Nova Scotia, and program-specific campuses in Yarmouth, Nova Scotia, and Saint John, New Brunswick. As of its latest enrolment report (December 1, 2023), the University had 21,088 students enrolled across its faculty groups. At the time of filing this report, Dalhousie employs approximately 6,177 employees.

Legal Status:

Dalhousie University is a body corporate and politic created by statute under the laws of Nova Scotia, Canada. Dalhousie is recognized as a non-profit organization incorporated through provincial legislation and is registered as a charitable organization under the name DALHOUSIE UNIVERSITY.

Organizational Structure:

Dalhousie operates under a bicameral governance structure, meaning it has two governing bodies: its Board of Governors and its Senate. The Board of Governors is responsible for the overall management of the University, with particular responsibility for property, revenue, and finances. The Senate is an academic governing body responsible for overseeing the academic and research activities of the University. Dalhousie’s President and Vice-Chancellor is responsible to the Board of Governors and the Senate for the supervision of the University’s administrative and academic work. The President and Vice-Chancellor works with the University’s senior administrative team to provide leadership to the University. A chart further detailing Dalhousie’s leadership structure can be found [here](#).

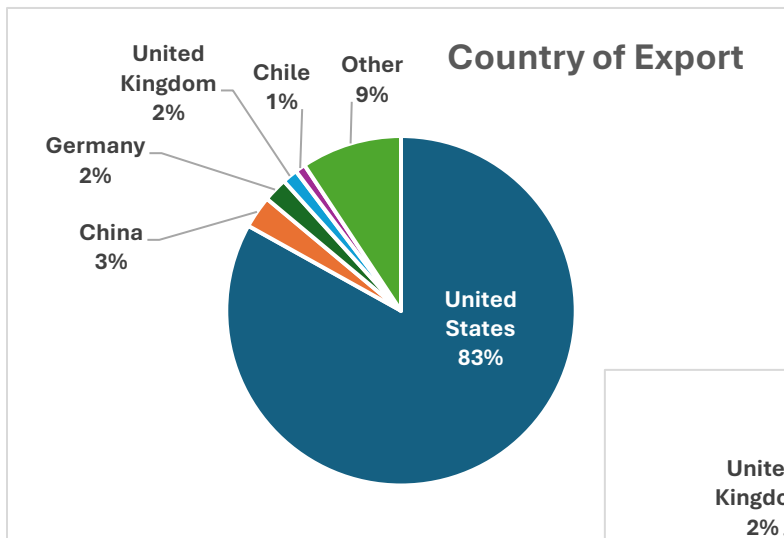
Activities and Supply Chains

Importation Activities

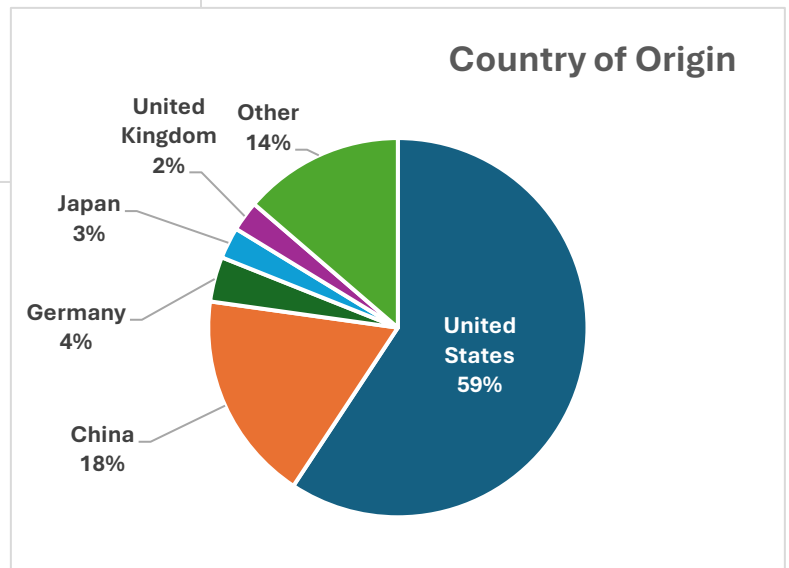
As a research-intensive university, Dalhousie’s primary activities are teaching and research. To support these activities, the University procures a wide range of goods and services, primarily from direct suppliers within North America. During its 2023-2024 fiscal year, Dalhousie spent approximately \$225 million in procurement-related expenditures.

During its 2023-2024 fiscal year, Dalhousie was the importer of record under the *Customs Act* for 2,104 shipments from outside of Canada (the “**Imported Goods**”). The total value of the Imported Goods was approximately \$11.5 million, representing approximately 5% of the University’s procurement-related expenditures, or 1% of its total expenditures, for its 2023-2024 fiscal year.

The Imported Goods were imported from 49 countries in total, with 83% imported from the United States. The top five countries of export are identified in the chart below:



The Imported Goods originated from 60 countries in total. The top five countries of origin are identified in the chart below:



The largest categories of goods imported by the University each year includes scientific and research equipment, biological matters, diagnostic or laboratory reagents, and print materials such as books, brochures, and leaflets.

Production Activities

Agricultural Campus

In 2012, Dalhousie merged with the former Nova Scotia Agricultural College located in Bible Hill, Nova Scotia, and thereby established the Dalhousie Agricultural Campus (the “**Agricultural Campus**” or the “**Campus**”). The Agricultural Campus is home to an operational farm.

Through its Agricultural Campus, the University provides diploma, undergraduate, Master of Science, and PhD students interested in pursuing a career in agriculture or veterinary medicine with experiential learning opportunities in production agriculture pertaining to dairy, sheep, poultry, mink, livestock feed production, and crops. The Campus’ farm utilizes best management practices to demonstrate the importance of animal care and welfare, nutrition, reproduction, housing and environmental stewardship and how they impact the primary production of milk, eggs, chicken, livestock, fur and crops. The goods produced are later processed and sold within the markets and regulatory bodies that support these commodities.

The following table includes the approximate quantities of goods produced and sold or used at the Campus during the University’s 2023 – 2024 fiscal year:

Good Produced, Used, or Sold	Quantity Produced, Used, or Sold
Milk produced and sold	492, 239 litres
Livestock (dairy) total inventory	95 (cows, heifers, and calves)
Livestock (dairy) sold	17 cull/open cows; 26 bull/beef calves
Livestock (sheep) total inventory	190 (ewes, rams, and lambs)
Livestock (sheep) sold	100 (lambs and breeding stock)
Livestock (mink) total inventory	1800 (adults and kits)
Livestock (mink pelts) sold	1300 (kits)
Livestock (layers) total inventory	2600
Eggs produced and sold	52, 000 dozen
Broilers (meat birds) produced and sold	3, 923
Crops (soybeans) produced and sold	58 tonnes
Crops (legume/grass silage and hay) produced and used on farm	630 tonnes silage; 550 round bale hay; 720 square bale hay
Crops (corn silage and grain) produced and used on farm	360 tonnes corn silage; 66 tonnes grain corn
Crops (mixed vegetable)	15, 000 lbs

In the course of their studies, students of the Agricultural Campus also learn about the strategic selection of inputs to maximize the efficiency, yield, and quality of agricultural products. In its procurement of goods to support its Agricultural Campus production activities, the University primarily sources goods from Atlantic Canadian suppliers. The University chooses to procure from local vendors to reduce transportation time and costs, ensure products are best suited to the

Agricultural Campus' geographical and climatic conditions, and demonstrate the University's commitment to support its local industries and economy.

In 2018, the University converted the Agricultural Campus' traditional heating plant to a biomass co-generation plant, placing Dalhousie on the leading edge of sustainable technology and renewable energy practices in North America. The plant utilizes locally sourced biomass to produce 1MW electricity, which is sold in its entirety to Nova Scotia Power through the COMFIT Program. Waste heat generated by the co-generation plant is captured and utilized to meet the Agricultural Campus' heating needs, contributing to the Campus' carbon neutrality goals.

TUNS Brewery

To support teaching and research within the University's Faculty of Engineering, the University operates a small-scale brewery funded by the Faculty of Engineering and the Canadian Institute of Fermentation Technology. The brewery, known as the TUNS Brewery, provides engineering students with the opportunity to brew their own beer and learn about all aspects of fermentation processes through an undergraduate course in brewing science. The beer produced is then primarily sold to student bars on campus as a way to showcase the capabilities of students interested in brewery science and to engage students, faculty, industry, and the public. In a given school year, approximately 24 twenty-litre kegs are produced through the brewery.

II. Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Procurement Framework

As a public institution, Dalhousie has a responsibility to act and be seen to act in a fair and open manner. The University's purchasing activities must be conducted in accordance with this responsibility. Dalhousie has developed a set of policies which, together, establish the governing framework for procurement activities at the University:

- [Dalhousie University Procurement Policy](#);
- [Dalhousie University Procurement Code of Conduct](#);
- [Dalhousie University Spending Authority for University Funds](#); and
- Purchasing Methods and Dollar Limits (for internal use only).

Together, these policies aim to establish a University procurement framework that is ethical, equitable, and transparent. The University's central Procurement department engages in periodic reviews of these procurement policies, as well as regular reviews of University-wide procurement requests, to ensure compliance with applicable procurement legislation and international free trade agreements. While the University's procurement policies guide University employees and University suppliers to consider sustainability and social responsibility in their procurement, the policies do not currently include specific prohibitions on the use of forced labour or child labour in the University's supply chains.

Sustainability Policy and Checklist

Dalhousie's Office of Sustainability strives to ensure that sustainability is woven into all of the University's activities. The Office of Sustainability has developed the University's [Sustainability Policy](#), which applies to all administrative activity within the University, including procurement.

Section 1.5 of the Sustainability Policy sets out sustainability criteria to be used by the University in evaluating procurement, including environmental, economic, social, and health considerations. In keeping with this intent, the policy sets out a list of eighteen sustainability actions, and states that it is important to the University that its sponsors, suppliers, contractors, consultants, vendors, and agents commit to the list of actions. The list includes a commitment that suppliers and vendors:

- **Support no use of forced labour**, including prison labour, indentured labour, bonded labour, or other forms of forced labour; and
- **Prohibit the use of forced and child labour**. No person shall be employed under the age of 14 or under the age for completion of compulsory education, whichever is higher.

University employees also have access to the internal Dalhousie University Sustainable Procurement Checklist, which serves to guide employees to consider sustainability criteria when making purchasing decisions. Employees are invited to send the checklist directly to potential vendors to ensure vendors are aware of the sustainability criteria that are important to the University. The checklist includes the criteria that suppliers meet applicable employment standards, including that they do not use forced labour or child labour in their activities.

Fair Labour Association Membership and Fairtrade Campus Designation

In 2021, Dalhousie became a member of the Fair Labour Association. Established in 1999, the Fair Labour Association is a multi-stakeholder initiative that includes universities and civil society organizations from around the world who are committed to protecting workers' rights through adherence to international labour standards. As members of the Fair Labour Association, the University has access to comprehensive resources relating to global labour rights issues.

In January of 2024, Dalhousie earned its Fairtrade Campus Designation through Fairtrade Canada. To earn this designation, Dalhousie made a commitment to prioritize the availability of Fairtrade products across its campuses to ensure that members of the Dalhousie community have access to ethically sourced goods. The University also created a Fairtrade steering committee composed of active volunteers and administrative members that will meet regularly to organize events and activities to increase the visibility of Fairtrade products on campus and educate the Dalhousie community about the meaning of fair trade.

Sustainability Guides for Employees and Student Societies

In recognition of the high-risk nature of the garments and linen industry (an industry from which the University procures goods), the University has established an [online guide for sustainable procurement of garments and linens](#). The guide encourages University employees and student societies to consider the impact of their procurement choices when purchasing garments and linens, and provides a list of key considerations that should be made when purchasing clothing,

such as ensuring that no forced labour or child labour was used in the clothing's supply chain. The guide also provides University members with a list of suggested questions to ask vendors when purchasing linens and garments, including:

1. Are vendors and factories compliant with international labour standards that protect workers rights by prohibiting child/forced labour, protecting health and safety, and ensuring wages and hours meet legal industry standards?
2. Do vendors comply with the Fair Labour Association's Code of Conduct and/or the Worker Rights Consortium Code of Conduct?

The guide encourages University members to purchase clothing that is locally produced, when possible.

Internal Human Resources Policies

With respect to its own production activities, the University has robust human resources policies and due diligence processes in place to ensure that the University's employment of all of its employees – including those engaged in production at its Agricultural Campus – meets minimum employment standards established under provincial employment standards legislation. Employment of unionized employees at Dalhousie is governed by collective agreements which have been negotiated between the University and applicable representative unions. As part of the hiring confirmation process, prospective employees are required to provide appropriate documentation to confirm their legal eligibility to work in Canada, including SIN numbers, date of birth, and other relevant materials to ensure legal and tax compliance.

III. Supply Chain Risks: Forced Labour and Child Labour

Dalhousie currently relies on international literature, reports, and guidance to identify and assess risks of forced labour and child labour in its supply chains. Drawing from the [United Nations' report on Ending Child Labour, Forced Labour, and Human Trafficking in Global Supply Chains](#), the University recognizes that the production of textiles and apparels, wholesale and retail goods, and agricultural products carry a particularly high risk of forced labour or child labour. Similarly, from the United States' Bureau of International Labor Affairs' published [List of Goods Produced by Child Labor or Forced Labor](#), Dalhousie has identified textiles, garments, food products, metals (used to produce reagents), timber (used to produce printed materials), electronics, rubber gloves, lithium batteries, and surgical instruments as high-risk goods that are procured by the University.

The University has also identified that approximately 18% of the Imported Goods (i.e. goods imported by the University in its 2023-2024 fiscal year for which the University was the importer of record under the Customs Act) originated in China, a country identified in the above-referenced List of Goods Produced by Child Labour and Forced Labor Report as a potential risk area for the use of child labour or forced labour. As explained in the "Next Steps" section below, the University commits to continue its efforts to assess risks of forced labour or child labour in its supply chains.

IV. Remediation Measures

As Dalhousie has not yet identified any specific instances of forced labour or child labour in its supply chains, no measures have been taken in this area.

V. Remediation of Loss of Income

As Dalhousie has not yet taken any measures to remediate any identified forced labour or child labour in its supply chains, no measures have been taken in this area.

VI. Training

At the current time, Dalhousie does not provide training to its staff in relation to identifying, reducing, or preventing forced labour or child labour in the University's supply chains. As further described in the "Next Steps" section below, Dalhousie commits to explore opportunities to provide training in this area to its procurement staff.

With respect to its own activities, the University offers training to unionized employees, as well as individuals in supervisory positions, to ensure a shared understanding of employees' rights under their governing collective agreement, including provisions related to hours of work, compensation, and entitlement to overtime.

VII. Assessing Effectiveness

No measures have been taken to assess the University's effectiveness in preventing and reducing risks of forced labour or child labour in the University's supply chains or in its own activities.

VIII. Next Steps

Dalhousie commits to take the following steps to work to identify and reduce risks of forced labour or child labour in its supply chains:

- **Training.** Dalhousie commits to explore training opportunities to increase awareness of forced labour and child labour amongst its procurement staff;
- **Policy Review.** Dalhousie commits to undertake a review of its procurement policies with the intention to incorporate specific wording relating to prohibiting the use of forced labour and child labour in its supply chains into its procurement policies; and
- **Improve Visibility Over Supply Chains.** Dalhousie is currently in the process of implementing a new supplier management system. Dalhousie anticipates that the system will improve the University's record-keeping with respect to its procurement activities and improve the University's visibility over its supply chains, which will assist the University in


identifying and assessing risks of forced labour and child labour in its supply chains moving forward. The University expects to launch the new supplier management system by 2025.

IX. Approval and Attestation

This report was approved by the Dalhousie Board of Governors on Tuesday, June 25, 2024. The report has been revised to include the attestation. The revised report was submitted to the Minister of Public Safety and Emergency Preparedness pursuant to section 12(1) of the Act.

In accordance with the requirements of the Act, and in particular section 11 thereof, I attest that I have reviewed the information contained in the report for the entity or entities listed above. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in the report is true, accurate and complete in all material respects for the purposes of the Act, for the reporting year listed above.”

I have the authority to bind Dalhousie University



Full Name

President and Vice-Chancellor

Title

June 25, 2024

Date