

**Reporting obligations under the Fighting Against Forced
Labour and Child Labour in Supply Chains Act**

Parks Canada Agency

May 31, 2024

PART 1: IDENTIFYING INFORMATION

Parks Canada Agency

Financial reporting period of April 1, 2023, to March 31, 2024.

Report Version 1

PART 2: REPORT CONTENTS

2.1 Information on the government institution's structure, activities and supply chains

Parks Canada is a federal agency with the mandate to protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.

As the caretakers of one hundred and seventy-one national historic sites, forty-seven national parks, five national marine conservation areas and one national urban park, Parks Canada purchases various goods and services primarily related to the operational maintenance of these sites within Canada. These include, but not limited to, the procurement of exhibit displays, vehicles for the maintenance of national parks, historic site preservation, campground maintenance, wildlife monitoring, environmental remediation activities, highway maintenance and construction, the conservation of Canadian historical artefacts, as well as construction and maintenance of visitor and operational buildings (e.g., visitor centers, washrooms, maintenance compounds).

Parks Canada procured approximately \$68M* of goods between April 1st, 2023, to March 31, 2024.

*This does not include low dollar value purchases made using acquisition cards or any goods purchased under a construction services.

2.2 Information on the steps taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the government institution.

Parks Canada has integrated Public Services Procurement Canada's (PSPC) updated General Conditions and the updated PSPC Code of Conduct for Procurement in all purchasing activities over \$25K since PSPC most recently updated them. These include the following standard instructions and general condition clauses:

- [2003 21 \(2022-01-28\) Code of Conduct for Procurement—bid](#)
- [2003ACB 19 \(2022-01-28\) Code of Conduct for Procurement – bid](#)
- [2004 12 \(2022-01-28\) Code of Conduct for Procurement—bid](#)
- [2004ACB 15 \(2022-01-28\) Code of Conduct for Procurement—bid](#)
- [2005 14 \(2022-01-28\) Code of Conduct for Procurement—Standing Offer](#)
- [2008 20 \(2022-01-28\) Code of Conduct for Procurement—arrangement](#)
- [2009 14 \(2022-01-28\) Code of Conduct for Procurement—Standing Offer](#)
- [2010A 31 \(2022-01-28\) Code of Conduct for Procurement—contract](#)
- [2010A 32 \(2021-11-04\) Anti-forced labour requirements](#)
- [2010B 35 \(2022-01-28\) Code of Conduct for Procurement—contract](#)
- [2010C 31 \(2022-01-28\) Code of Conduct for Procurement—contract](#)
- [2015A 31 \(2022-01-28\) Code of Conduct for Procurement — contract](#)
- [2015A 32 \(2021-11-04\) Anti-forced labour requirements](#)
- [2020 18 \(2022-01-28\) Code of Conduct for Procurement—Supply Arrangement](#)
- [2029 28 \(2022-01-28\) Code of Conduct for Procurement—Contract](#)
- [2029 29 \(2021-11-04\) Anti-forced labour requirements](#)
- [2030 45 \(2022-01-28\) Code of Conduct for Procurement – Contract](#)
- [2030 46 \(2021-11-04\) Anti-forced labour requirements](#)
- [2035 45 \(2022-01-28\) Code of Conduct for Procurement—Contract](#)

Parks Canada also processes call-ups under existing PSPC Supply Arrangements and Standing Offers, which also contain the anti-forced labour requirements clauses specified above.

For the fiscal year 2024-2025, Parks Canada will incorporate PSPC clause [A3006T - Ethical Procurement Certification](#) to the default templates before the end of the fiscal year.

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour.

*** Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour? (Yes or No)**

Yes, effective April 1, 2023, amendments to the Treasury Board *Directive on the Management of Procurement* require contracting authorities from all departments listed in

Schedules I, I.1 and II of the *Financial Administration Act* (with the exception of the Canada Revenue Agency) and commissions established in accordance with the *Inquiries Act* and designated as a department for the purposes of the *Financial Administration Act* to incorporate the Code of Conduct for Procurement (“the Code”) into their procurements. This requirement applies to Parks Canada.

Pursuant to the aforementioned amendments, Parks Canada has integrated the Code into procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that Parks Canada has awarded included the Code of Conduct and include the inclusion of the general conditions for goods (listed and linked above).

The Code requires that vendors, providing goods and services to the Government of Canada and their sub-contractors, comply with all applicable laws and regulations. In addition, the Code requires vendors and their sub-contractors to comply with Canada’s prohibition on the importation of goods produced, in whole or in part, by forced or compulsory labour. This includes forced or compulsory child labour and applies to all goods, regardless of their country of origin.

The prohibition on the importation of goods produced wholly or in part by forced labour came into force under the *Customs Tariff* on July 1, 2020. This amendment implemented a commitment in the Labour Chapter of the Canada-United States-Mexico Agreement (CUSMA) and applies to all imports, regardless of origin.

2.4 Information on the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk.

No, Parks Canada has not started the process of assessing and managing the risks of its activities in supply chains that carry a risk of forced labour or child labour. As more awareness, training and resources become available on the subject, any signs of forced or child labour will be addressed under the applicable guidance and processes put in place by PSPC and/or Treasury Board of Canada Secretariat (TBS) in support of a Government of Canada approach.

*** Has the government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries?**

In May 2021, a risk analysis of PSPC’s supply chains was completed by Rights Lab, of the University of Nottingham (U.K.), to determine which goods were at the highest risk of exposure to human trafficking, forced labour, and child labour. The analysis, and subsequent report, elaborated key strategies for PSPC to leverage public spending power to raise awareness about forced labour in supply chains.

The findings of the report conducted for PSPC were used as the foundation to initiate an internal analysis at Parks Canada to identify the goods which could be at risk of exposure to forced labour and child labour. While some goods procured by Parks Canada were identified as having a higher risk, preliminary results indicate more analysis is needed to understand and identify the high-risk commodities, and the associated sectors and industries to mitigate the risk of forced labour and child labour in our activities and supply chains.

The procurement team members at Parks Canada have familiarized themselves with information on the risk assessment provided by PSPC, and are monitoring related follow-up action, including PSPC's development of a Policy on Ethical Procurement which is anticipated to be adopted by Parks Canada as appropriate in support of a Government of Canada approach.

2.5 Information on any measures taken to remediate any forced labour or child labour.

No, Parks Canada has not identified or taken measures to remediate any forced labour or child labour in its activities and supply chains. As more awareness, training and resources become available on the subject, any signs of forced or child labour will be addressed under the applicable guidance and processes put in place by PSPC and/or TBS in support of a Government of Canada approach.

2.6 Information on any measures taken to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced labour or child labour in the institution's activities and supply chains.

No, Parks Canada has not identified or taken measures to remediate the loss of income that result from measures taken to eliminate the use of forced or child labour. As more awareness, training and resources become available on the subject, any signs of forced or child labour will be addressed under the applicable guidance and processes put in place by PSPC and/or TBS in support of a Government of Canada approach.

2.7 Information on the training provided to employees on forced labour and child labour.

No, Parks Canada does not currently have training for employees on forced labour. However, PSPC is currently developing awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. Parks Canada is monitoring the development of these materials and will leverage these resources upon their publication in support of a consistent government-wide strategy, and create its own supporting tools, policies and procedures as appropriate.

Parks Canada will continue to create awareness for its contracting authorities through information sessions and updates during regular team meetings and request members attendance at information sessions made available through PSPC, TBS, and/or the Canadian Institute for Procurement and Materiel Management (CIPMM) as it becomes available.

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.

No, Parks Canada does not currently have policies and procedures in place to assess its effectiveness in ensuring forced labour and child labour are not being used in its activities and supply chains. Once these measures have been developed and implemented by PSPC, Parks Canada will leverage these measures in support of a government-wide approach to explore strategies for the establishment of its own monitoring and assessment framework.



Date: 05/30/2024

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