



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

Canadian Radio-television and Telecommunications Commission

Forced Labour in Canadian Supply Chains 2024-2025



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

© His Majesty the King in Right of Canada, as represented by the Canadian Radio-television and
Telecommunications Commission, 2025

Catalogue No. BC9-41E-PDF

ISSN 2818-4289

Canada 

Part 1: Submission Information

1. This report is for:

A government institution

2. State the legal name of the reporting entity or government institution

Name of government institution: Canadian Radio-television and Telecommunications Commission (CRTC)

3. Reporting year

May 31, 2025

4. Financial year covered by report

Financial reporting year (start date, end date): This report covers the activities undertaken during the CRTC's April 1, 2024 – March 31, 2025, financial year.

5. Is this a revised version of a report that was already submitted this reporting year?

No

12. For government institutions only: Is this a report for a parent federal Crown corporation or a wholly-owned subsidiary?

No

Part 2 - Reporting for Government institutions

1. Which of the following accurately describes the government institution's structure?

Other institution, body or office listed in Schedule I of the *Access to Information Act*

2. Which of the following accurately describes the government institution's activities?

CRTC, as a government institution, only purchases goods:

- in Canada
- outside Canada

Provide additional information on the government institution's structure, activities and supply chains.

The Canadian Radio-television and Telecommunications Commission (CRTC) is an administrative tribunal with quasi-judicial functions that operates at arm's length from the federal government and regulates the telecommunications and broadcasting sectors in the public interest.

The CRTC holds public consultations and makes decisions based on the public record. The CRTC has a wide range of responsibilities, including under the *Telecommunications Act*, the *Broadcasting Act*, the *Online News Act*, and Canada's Anti-Spam Legislation (CASL).

The CRTC has nine members, including a Chairperson, a Vice-Chairperson for Telecommunications, a Vice-Chairperson for Broadcasting, and six Commissioners who are located across the country. Supporting the Commission's decision-makers is a team of expert staff.

CRTC's expenditures for 2024-25 were slightly under \$100M including revenue spending authorities with almost 700 FTE (full-time equivalents).

The CRTC spends a relatively small amount on goods. CRTC's purchases are done through Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) procurement tools in the following categories: Office Supplies, Office Furniture, IT Equipment, and Online Subscriptions for Data and Newsletters.

The CRTC purchases mainly office supplies, office furniture and ergonomic seating through the Standing Offers and Supply Arrangements established by PSPC, while IT equipment is procured through SSC. The CRTC relies on PSPC standard tools and is therefore limited in the information we can provide.

The CRTC also procures goods as subscriptions for newsletters and various data related to our mandate.

3. What steps has the government institution taken in its previous financial year 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? Select all that apply.

Developing and implementing anti-forced labour and/or -child labour contractual clauses.

4. Please provide additional information describing the steps taken (if applicable) (3,000 character limit)

The CRTC has integrated PSPC's updated General Conditions for goods contracts and PSPC's Code of Conduct for Procurement in our purchasing activities. In addition, to prevent and reduce the risk of forced labour or child labour in our procurements, the CRTC has used the following list of PSPC's tools:

- Standing Offers

- Supply Arrangements
 - ProServices

- Shared Services Canada
- GC Cloud Services

- Anti-forced labour contract clauses as per policy notification 150 – Anti-forced labour requirements.

5. 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 to incorporate the Code of Conduct for Procurement (“the Code”). Specifically, this applies to all departments listed in Schedules I, I.1 and II of the *Financial Administration Act* (except for the Canada Revenue Agency) as well as Commissions established in accordance with the *Inquiries Act* and designated as a department for the purposes of the *Financial Administration Act*. The CRTC has integrated the Code into our procurement activities, with a view to safeguarding federal procurement supply chains from forced labour and child labour. All contracts awarded by our organization have included the Code as part of the General Conditions for goods.

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.

Effective November 20, 2023, PSPC updated its procurement tools by including anti-forced labour clauses in all new, amended, or refreshed Standing Offers and Supply

Arrangements for goods. This ensures that a broader range of procurement instruments includes these safeguards. The CRTC has implemented those updates as prescribed by PSPC.

5.1 If yes, which of the following elements of the policies and/or due diligence process has the government institution implemented in relation to forced labour and/or child labour? Select all that apply.

- Embedding responsible business conduct into policies and management systems
- Ceasing, preventing or mitigating potential and actual adverse impacts
- Tracking implementation and results
- Communicating how impacts are addressed
- Providing for or cooperating in remediation when appropriate

6. Has the government institution identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

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. We have familiarized ourselves with information on the risk assessment provided by PSPC, and are monitoring related follow-up actions, including the development of a Policy on Ethical Procurement.

7. 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? Select all that apply.

None of the above

8. Has the government institution taken any measures to remediate any forced labour or child labour in its activities and supply chains?

Not applicable, as we have not identified any forced labour or child labour in our activities and supply chains.

9. Has the government institution taken any measures to remediate the loss of income to the most vulnerable individuals and families that results from any measure taken to eliminate the use of forced labour or child labour in its activities and supply chains?

Not applicable, as we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

10. Does the government institution currently provide training to employees on forced labour and/or child labour? (Y/N)

No. However, the CRTC is aware that PSPC is currently raising awareness and developing guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. We are monitoring the development of these materials and will leverage these resources upon their publication. In the meantime, the CRTC promotes related training as available via the CSPS. The organization has not developed its own specific training on this topic.

11. Does the government institution currently have policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains? (Yes or No)

No