



Canadian  
Transportation  
Agency

Office  
des transports  
du Canada



# Reporting obligations under the Fighting Against Forced Labour and Child Labour in Supply Chains Act 2024 – 2025

Canadian Transportation Agency

**Table of Contents**

Identifying Information ..... 3

Report Contents..... 3

    Structure, activities and supply chains ..... 3

    Steps to prevent and reduce risks of forced labour and child labour ..... 4

    Policies and due diligence processes in relation to forced labour and child labour ..... 5

    Identifying parts of activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage those risks ..... 6

    Measures taken to remediate any forced labour or child labour ..... 6

    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 ..... 6

    Training provided to employees on forced labour and child labour ..... 7

    Assessing effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains ..... 7

# Identifying Information

Canadian Transportation Agency

April 1, 2024 – March 31st, 2025.

This is an original report.

This report is not produced by a federal Crown corporation or a subsidiary of a federal Crown corporation.

## Report Contents

### Structure, activities and supply chains

The Canadian Transportation Agency (CTA) is a federal agency which acts as an independent regulator and quasi-judicial tribunal with the powers of a superior court. It operates within the context of the very large and complex Canadian transportation system.

The CTA's responsibilities are:

- To help ensure that the national transportation system runs efficiently and smoothly in the interests of all Canadians: those who work and invest in it; the producers, shippers, travellers, and businesses who rely on it; and the communities where it operates.
- To provide consumer protection for air passengers.
- To protect the human right of persons with disabilities to an accessible transportation network.

The CTA is comprised of up to five permanent and three temporary Members who act like administrative judges, and are appointed by the Governor-in-Council, as well as about 330 employees.

At the CTA, approximately 45% of the annual value of our purchases were made through the use of PSPC tools such as Standing Offers and Supply Arrangements.

Since November, 2021, PSPC implemented anti-forced labour clauses in all goods contracts to ensure that it can terminate contracts where there is credible information that the goods have been produced in whole or in part by forced labour or human trafficking.

Additionally, since November 20, 2023, all PSPC Standing Offers and Supply Arrangements for goods that have been issued, amended, or refreshed include anti-forced labour clauses.

As such, all of our contracts for goods resulting from the use of these tools include clauses relating to forced labour which set out, among other things, human rights and labour rights requirements. These clauses can be found in the policy notification 150 – Anti-forced labour requirements.

At the CTA, approximately 38% of the annual value of our purchases were made through Shared Services Canada (SSC) using PSPC tools such as Standing Offers and Supply Arrangements.

Since November 2021, SSC has implemented anti-forced labour clauses in all goods contracts to ensure that it can terminate contracts where there is credible information that the goods have been produced in whole or in part by forced labour or human trafficking. Furthermore, as of November 20, 2023, all SSC Standing Offers and Supply Arrangements that have been issued, amended, or refreshed include anti-forced labour clauses as part of the general conditions for goods.

As such, all of our contracts for goods resulting from the use of SSC's tools include PSPC's clauses relating to forced labour, which outline, among other things, human rights and labour rights requirements.

During this reporting period we purchased the following goods under our own procurement authority: 03 Information, 04 Professional & Special Services, 05 Rentals, 06 Repair & Maintenance.

## **Steps to prevent and reduce risks of forced labour and child labour**

The CTA has integrated PSPC's Standard Contract Clauses including PSPC's Code of Conduct for Procurement and anti-forced labour clauses in our purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in our procurements, CTA has used the following list of PSPC's tools:

- Standing Offers
- Supply Arrangements
- Anti-forced labour contract clauses

PSPC has developed awareness-raising guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. The materials are progressively becoming available on the [canada.ca](https://www.canada.ca) website.

CTA has used PSPC's awareness materials to guide our suppliers and safeguard our supply chains from forced labour and child labour. Furthermore, we are referring our procurement personnel to these materials for awareness.

The April 1, 2023 amendments to the Treasury Board Directive on the Management of Procurement required several contracting authorities to incorporate the Code of Conduct for Procurement ("the Code") into their procurements. In compliance with these amendments, SSC has integrated the Code into its procurements.

As a common service provider, SSC is responsible for ensuring that government departments have access to reliable, secure, and cost-effective IT infrastructure and solutions, including shared services related to networks and network security, data centres and Cloud offerings, digital communications, and IT tools.

CTA also undertakes activities under its own procurement authority, independently of the aforementioned PSPC tools. During the previous fiscal year we purchased goods under our own procurement authority in the following areas: 03 Information, 04 Professional & Special Services, 05 Rentals, 06 Repair & Maintenance.

## **Policies and due diligence processes in relation to forced labour and child labour**

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.

The Code requires that vendors, providing goods 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.

Pursuant to the aforementioned amendments, CTA has continued to integrate the Code into our procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that our organization has awarded included the Code through the General Conditions for goods.

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.

## **Identifying parts of activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage those risks**

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 took note of the findings and recommendations of this risk analysis, and are monitoring related follow-action, including the implementation of the Policy on Ethical Procurement and the development of a human rights due diligence framework.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

## **Measures taken to remediate any forced labour or child labour**

The CTA has not identified any potential for forced and/or child labour in their procurement activities and supply chains.

## **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**

The CTA has not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced and/or child labour in their activities and supply chains.

## **Training provided to employees on forced labour and child labour**

The CTA does not currently provide training to employees on forced and/or child labour.

The CTA is aware that PSPC has developed and is currently piloting a course for procurement officers. We will leverage the course upon its publication for use across the Government of Canada.

SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

## **Assessing effectiveness in ensuring that forced labour and child labour are not being used in activities and supply chains**

The CTA does not engage in goods procurement outside of the above mentioned PSPC tools and rely on these tools for their effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains.