



**Crown-Indigenous
Relations and Northern
Affairs Canada – 2025
Annual Report under the
*Fighting Against Forced
Labour and Child Labour
in Supply Chains Act***



Submission Information

This report is submitted on behalf of Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) and covers activities from March 31, 2024, to April 1, 2025.

Annual Report

Structure, Activities and Supply Chains

Indicate which of the following describes your government institution's structure:
Federal Department or Agency

Describe how your government institution engages in the following activities:

- Purchasing Goods
 - In Canada
 - Outside Canada
- Crown-Indigenous Relations and Northern Affairs Canada (CIRNAC) continues to renew the nation-to-nation, Inuit-Crown, government-to-government relationship between Canada and First Nations, Inuit and Métis; modernize Government of Canada structures to enable Indigenous peoples to build capacity and support their vision of self-determination and lead the Government of Canada's work in the North.
- At CIRNAC, approximately 65% of the annual value of our purchases of goods and services, were made through the use of various PSPC tools including, but not limited to, 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 CIRNAC, approximately 1% of the annual value of our purchases of goods and services were made through the use of Shared Services Canada (SSC) tools including, but not limited to, 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 to 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

The table below represents the most common types of goods procured by CIRNAC in the last fiscal year

Type of Goods	# of Contracts	\$ Value
Computer Equipment	8	\$136,225.11
Creation/Distribution of Indigenous Products	1	\$13,952.22
Office Furniture	2	\$56,412.30

Steps to prevent and reduce risks of Forced Labour and Child Labour

Describe the steps your government institution has 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.

- CIRNAC 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, CIRNAC 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 website. CIRNAC 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. To prevent and reduce the risk of forced labour or child labour in our procurements, CIRNAC has used the following list of SSC’s tools to which the Code applies: Standing Offers, Supply Arrangements,



Contracts. 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.

- CIRNAC also undertakes activities under its own procurement authority, independently of the aforementioned SSC tools. During the previous fiscal year we purchased goods under our own procurement authority in the following areas:
 - Computer Equipment
 - Creation/Distribution of Indigenous Products

Policies and due diligence processes in relation to Forced Labour and Child Labour

Indicate whether your government institution has policies and/or due diligence processes in place related to forced labour and/or child labour and, if applicable, describe these policies and/or processes.

- CIRNAC does not currently have their own policies. However, 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, CIRNAC 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 your institution's 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

Indicate in your report whether your government institution has identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used.

- CIRNAC has not started the process of identifying risks. However 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.
- For procurements made through SSC tools, 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. CIRNAC's procurement team will request relevant updates regarding SSC's ongoing work to assess forced labour and child labour risks in their activities and supply chains.

Indicate the aspects of your activities and/or supply chains that have been identified as carrying forced labour or child labour risks.

- CIRNAC has yet to identify activities and/or supply chains that carry risks of forced labour or child labour

Indicate whether your government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries:

- CIRNAC has not identified forced labour or child labour risks in any of the following sectors and industries;
 - Agriculture, forestry, fishing and hunting
 - Mining, quarrying, and oil and gas extraction
 - Utilities
 - Construction
 - Manufacturing



- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation
- Accommodation and food services
- Other services (except public administration)
- Public administration

Measures taken to remediate any Forced Labour or Child Labour

Indicate whether your government institution has taken any measures to remediate any forced labour or child labour in its activities and supply chains. For example, you may include one of the following statements:

- We have not identified any forced labour or child labour in our 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

Indicate in your report whether your government institution has taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced or child labour in its activities and supply chains.

- 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/or supply chains. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.

Training provided to employees on Forced Labour and Child Labour



Indicate whether your government institution currently provides training to employees on forced labour and/or child labour.

- We are 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

Indicate whether your government institution currently has 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. If applicable, describe the methods used by your government institution to assess its effectiveness.

- CIRNAC will regularly review and update their internal policies and procedures to ensure any updates related to forced labour and child labour from central departments (TBS, PSPC, and SSC) are adopted.