

2025 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*



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As per its reporting obligations under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), which came into force on January 1, 2024, Immigration, Refugees and Citizenship Canada (IRCC) has prepared its second annual report on forced labour in Canadian Supply Chains.

This document was submitted in parallel with the mandatory [Questionnaire](#) and, once finalized, will be available on [IRCC's website](#) and in the [Public Safety Canada Catalogue](#).

SUBMISSION INFORMATION

Name of government institution

Immigration, Refugees and Citizenship Canada

Financial reporting year

April 1, 2024 to March 31, 2025

Indicate if this is a revised report

This is the original report.

Indicate if this is a report produced by a federal Crown corporation or a subsidiary of a federal Crown corporation

Not applicable

ANNUAL REPORT

Structure, activities and supply chains

Immigration, Refugees and Citizenship Canada (IRCC) is a Federal department that is responsible for the [Citizenship Act](#), shares responsibility with Public Safety Canada for the [Immigration and Refugee Protection Act](#) and is also responsible for Passport Canada. IRCC's procurement and contracting activities are guided by its mission to build a stronger Canada by:

- Developing and implementing policies, programs and services that:
 - facilitate the arrival of people and their integration into Canada in a way that maximizes their contribution to the country while protecting the health, safety and security of Canadians;
 - maintain Canada's humanitarian tradition by protecting refugees and people in need of protection;
 - enhance the values and promote the rights and responsibilities of Canadian citizenship; and

- reach out to all Canadians and foster increased intercultural understanding and an integrated society with equal opportunity for all, regardless of race, ethnicity and religion.
- Advancing global migration policies in a way that supports Canada's immigration and humanitarian objectives.

IRCC's procurement activities include, but are not limited to, the purchase, distribution and production of goods in and outside of Canada. In the 2024-2025 fiscal year, the value of IRCC's goods procurement was \$ 34,614,907.81 and the top three categories, as identified through the [Goods and Services Identification Numbers \(GSIN\)](#), for the highest number of contracts and the highest aggregate contract value were:

- N7030 – ADP Software (116 contracts, aggregate value of \$24,063,010.79)
- N7045 – Computer Supplies (61 contracts, aggregate value of \$371,816.51)
- N7110 – Office Furniture (18 contracts, aggregate value of \$639,954.31)

At IRCC, approximately 10% of the annual value of IRCC's goods 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 IRCC's 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 IRCC, approximately 26.5% of the annual value of IRCC's goods purchases were made through the use of Shared Services Canada (SSC) 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 IRCC 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, IRCC purchased goods under its own procurement authority in the following categories (GSINs):

- N3610 – Printing, Duplicating, and Bookbinding Equipment
- N5820DC – Monitors, CCTV, Video
- N5835L – Mixers, Audio
- N5836 – Video Recording and Reproduction Equipment
- N5965 – Headsets, Handsets, Microphones and Speakers

- N6350 – Alarm, Signal, and Security Detection Systems, Miscellaneous
- N6515CF – Defibrillators
- N6750CF – Film, Graphic Arts (Photomechanical - copy film - scribing materials)
- N6760CD – Lens, Audio Visual Projectors
- N7010 – Automatic Data Processing Equipment, System Configuration
- N7010126 – Computers, Micro, Laptop
- N7025060 – Keyboards-Microcomputer
- N7025104 – Printers, Ink Jet
- N7025134 – Scanners, Document
- N7025405 – Local Area Networks, Systems and Components
- N7030 – ADP Software
- N7030100 – Software Suppliers, Application, Business, Personnel Management, EDP
- N7030175 – Computer Software, Business Administration/Management, Planning, Market Trade
- N7030250 – Computer Software For Technology Assisted Training
- N7030ACE – Computer Software, Engineering, Scientific, Mathematical, Statistical
- N7045 – Computer Supplies
- N7105E – Frame, Picture
- N7110 – Office Furniture
- N7110C – Chair (Office)
- N7110CCC – Chair, Rotary, Office Type (Except Standard)
- N7110CDB – Chair, Straight Side, with Arms, Metal Frame
- N7490QC – Mailing Machine, Electric
- N7490T – Postage Meter
- N7510 – Office Supplies
- N7530 – Stationery and Record Forms
- N7530G – Certificate, Retirement or Award
- N7530MB – Paper - Copying, Bond, White for Photocopies, Printers, Fax and General Purpose
- N7540 – Standard Forms
- N8910 – Dairy Foods and Eggs
- N9905K – Signs

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

IRCC aligns all of its procurement practices with the [Directive on the Management of Procurement](#) and has integrated PSPC's Standard Contract Clauses including PSPC's [Code of Conduct for Procurement](#), in its purchasing activities. IRCC also proactively updated its in-house General Terms and Conditions to include an Anti-Forced Labour Requirements clause so that all IRCC requirements, whether using PSPC or IRCC General Conditions, would include this clause. In addition, to prevent and reduce the risk of forced labour or child labour in its procurements, IRCC 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. IRCC has used PSPC's awareness materials to guide its suppliers and safeguard its supply chains from forced labour and child labour. Furthermore, IRCC is referring its 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, IRCC 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.

While PSPC and SSC support government institutions in their daily operations by acting as central purchasing agents and common service providers for the Government of Canada, IRCC undertakes activities under its own procurement authority, independently of the aforementioned PSPC and SSC tools. During the previous fiscal year, IRCC purchased goods and services under its own procurement authority in the following areas:

- N3610 – Printing, Duplicating, and Bookbinding Equipment
- N6350 – Alarm, Signal, and Security Detection Systems, Miscellaneous
- N6750CF – Film, Graphic Arts (Photomechanical - copy film - scribing materials)
- N6760CD – Lens, Audio Visual Projectors
- N7010 – Automatic Data Processing Equipment, System Configuration
- N7025060 – Keyboards-Microcomputer
- N7025405 – Local Area Networks, Systems and Components
- N7030 – ADP Software
- N7030175 – Computer Software, Business Administration/Management, Planning, Market Trade
- N7030250 – Computer Software for Technology Assisted Training
- N7030ACE – Computer Software, Engineering, Scientific, Mathematical, Statistical
- N7045 – Computer Supplies
- N7105E – Frame, Picture
- N7110 – Office Furniture

- N7110C – Chair (Office)
- N7110CDB – Chair, Straight Side, with Arms, Metal Frame
- N7490QC – Mailing Machine, Electric
- N7490T – Postage Meter
- N7510 – Office Supplies
- N7530 – Stationery and Record Forms
- N7530G – Certificate, Retirement or Award
- N7540 – Standard Forms
- N8910 – Dairy Foods and Eggs

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, IRCC has continued to integrate the Code into its procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that IRCC 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

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.

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

Measures taken to remediate any forced labour or child labour

To date, IRCC has not been made aware or does not have any information supporting that any forced labour or child labour has occurred in its procurement activities or 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

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

Training provided to employees on forced labour and child labour

In January 2025, IRCC issued a department-wide communication to all IRCC employees to raise awareness on their role as Government of Canada employees in ethical procurement and combating forced labour in supply chains. This communication included a Forced Labour in Canadian Supply Chains Resource Guide which contains information about:

- the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*;
- the role of business owners as per the Directive on the Management of Procurement;
- Canada's response (e.g., trade agreements, the Procurement Code of Conduct and Global Affairs Canada, Public Services and Procurement Canada and Public Safety Canada initiatives and resources); and
- external resources (e.g., Organization for Economic Co-Operation and Development (OECD), International Labour Organization (ILO), Institute on Migration (IOM) and International Organization for Standardization (ISO) information and resources).

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

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

IRCC is monitoring the development of guidance and resources from PSPC, including the PSPC Policy on Ethical Procurement, and will leverage these resources upon their release.