



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

Department of Justice Canada
[2024/2025 Reporting Year]



REPORT TITLE

Department of Justice Canada - 2024 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

SUBMISSION INFORMATION

Include in this section the following mandatory information:

- Department of Justice Canada
- Financial reporting year April 1, 2024 to March 31, 2025

Indicate for which reporting period you are submitting a report:

- 2025 reporting period (May 31, 2025 deadline)

ANNUAL REPORT

1. Structure, activities and supply chains

The Department of Justice Canada supports the dual roles of the Minister of Justice and the Attorney General of Canada.

The Department of Justice Canada was officially established in 1868, when the Department of Justice Act was passed in Parliament. The Act sets out the roles and responsibilities of the Minister of Justice and Attorney General of Canada, as well as those of the Department.

The Department of Justice Canada fulfils three distinctive roles within the Government of Canada. It acts as:

- a policy department with broad responsibilities for overseeing all matters relating to the administration of justice that fall within the federal domain - in this capacity, it strives to ensure a fair, accessible, and relevant Canadian justice system for all Canadians.
- a provider of a range of legal advisory, litigation and legislative services to federal government departments and agencies; and
- a central agency responsible for supporting the Minister in advising Cabinet on all legal matters.

With a workforce exceeding 5,000 full-time equivalent employees, approximately 66 percent of Justice Canada's personnel are situated in the National Capital Region. The remaining 34 percent contribute to a robust national presence through regional offices and sub-offices across the country.

1.1. Goods purchases using Public Services and Procurement Canada's (PSPC) procurement tools

At the Department of Justice Canada, approximately 75% of the annual value of the Department's goods purchases are 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 to include anti-forced labour clauses.



As such, all the Department's contracts for goods resulting from the use of these tools include clauses related to forced labour which set out, among other things, human rights and labour rights requirements. These clauses can be found in the [policy notification 150U1 – Anti-forced labour requirements](#).

1.2. Goods purchases using Shared Services Canada (SSC) procurement tools

At the Department of Justice Canada, approximately 19% of the annual value of our goods purchases were made through the use of 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 to include anti-forced labour clauses as part of the general conditions for goods.

As such, all 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.

Overall, for fiscal year 2024-2025, the Department of Justice Canada held a total contract value of \$6.4 million for the purchase of goods, which were primarily sourced with Canadian vendors for mainly IT equipment and office furniture. Of the \$6.4 million, a total of 94% was contracted using either PSPC or SSC procurement tools. The remaining 6% of goods were purchased under the Department's own procurement authority for the following types of commodities: software, ergonomic furniture and seating, and IT equipment and accessories.

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

The Department of Justice Canada has integrated Public Services and Procurement Canada's (PSPC) updated Terms and Conditions for goods contracts and PSPC's [Code of Conduct of Procurement](#) in its purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in its procurements, the Department of Justice Canada has used the following list of PSPC 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.

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 Justice’s procurements, the Department of Justice Canada has used the following list of SSC 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.

3. 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.

Pursuant to these amendments, the Department of Justice has integrated the Code into its procurement practices, with a view to safeguarding federal procurement supply chains

from forced labour and child labour. Contracts awarded by the Department of Justice include the Code through the Terms and 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.

4. 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.

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

As for goods purchased through SSC procurement 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.

Although the Department of Justice Canada has not yet detected any forced labour or child labour risks within its activities and supply chains, it will keep a close watch on PSPC and SSC evaluations of goods in its supply chains that pose the highest risks and will take appropriate actions based on those assessments.



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

In the absence of information indicating concern with existing supply chains, the Department of Justice Canada has not yet taken any measures in this area. However, the Department will engage with PSPC to explore measures to be taken should this situation arise.

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

No measures have been taken as the Department of Justice 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/or supply chains.

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

The Department of Justice Canada has not yet provided any specific training to employees on forced labour and/or child labour in the context of procurement. The Department will mandate related training for all procurement officers when it becomes available through PSPC or the Canada School of Public Service.

The Department of Justice Canada is aware that PSPC has developed training and is currently piloting a course for procurement officers. The Department will leverage the course upon its publication for use across the Government of Canada. As for goods purchased through SSC procurement 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.

In addition, the Department encouraged its procurement officers to participate in any training and Webinar sessions hosted by PSPC or SSC on this subject. For example, in the spring of 2024, PSPC, in collaboration with SSC, hosted a webinar on forced labour in the electronics supply chains. Participants had the opportunity to learn about electronics



industry supply chains, the various risks of forced labour they contain, and mitigation and remediation strategies for businesses.

While this was not a formal training session, it provides a learning opportunity for procurement officers and helps raise awareness of the complexity of modern supply chains and the risks of forced labour.

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

At present, the Department of Justice Canada has no specific 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. However, the Department of Justice Canada regularly monitors audit findings from both the Office of the Auditor General of Canada and the Office of the Procurement Ombudsman's procurement practice review reports. By closely examining these findings, the Department will be able to identify any potential areas for improvement within its own procurement activities. Additionally, the Department will actively collaborate with PSPC to explore and evaluate policies and procedures that could enhance the effectiveness of its procurement practices. This approach ensures that the Department remains vigilant and responsive to any issues that may arise.