



Military Grievances
External Review Committee

Comité externe d'examen
des griefs militaires

2025

Military Grievances External Review Committee – 2025 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

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, the Military Grievances External Review Committee (the Committee) has prepared its 2025 Annual Report on Forced Labour in Canadian Supply Chains. This document is submitted in parallel with the mandatory [Questionnaire](#) designed to collect submission information and information relevant to the requirements of the Act.

PART 1: IDENTIFYING INFORMATION
<p>Name of government institution</p> <p>Military Grievances External Review Committee</p>
<p>Financial reporting year</p> <p>April 1, 2024, to March 31, 2025</p>
<p>Indicate if this is a revised report</p> <p>This is the original report.</p>
<p>Indicate if this is a report produced by a federal Crown corporation or a subsidiary of a federal Crown corporation</p> <p>The Committee is not a federal Crown corporation or a subsidiary of a federal Crown corporations.</p>
ANNUAL REPORT
<p>Structure, activities and supply chains</p>
<p>The Committee is an independent administrative tribunal reporting to Parliament through the Minister of National Defence. The Committee reviews military grievances referred to it pursuant to section 29 of the <i>National Defence Act</i> and provides findings and recommendations to the Chief of the Defence Staff and the Canadian Armed Forces member who submitted the grievance.</p>

The Committee is a micro-organization operating with approximately 50 full-time equivalents and supports the Chairperson and Chief Executive Officer in fulfilling her mandate. The Committee operated in 2024-25 with a budget of \$8.2M, of which approximately 82% is dedicated to salaries.

On average, the Committee spends about \$1.1M annually on operating and maintenance costs. 54% of that amount covers rent and Memorandums of Understanding (MOU), as well as Service Level Agreements (SLA) with other government departments (OGD).

While Public Services and Procurement Canada (PSPC) supports government institutions in their daily operations by acting as the central purchasing agent for the Government of Canada, the Committee mostly undertakes activities under its own procurement authority.

In the 2024-25 fiscal year, the Committee purchased approximately \$88K in goods, including office supplies, furniture, and IT equipment, representing approximately 8% of its total operating and maintenance expenditures. The Committee procurement activities include, but are not limited to, the purchase of goods in and outside of Canada.

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

The Committee aligns its procurement practices with the [Directive on the Management of Procurement](#) and has integrated PSPC's updated General Conditions for goods contracts and PSPC's [Code of Conduct for Procurement](#) in its purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in procurement, the Committee has used PSPC tools such as Standing Offers and Supply Arrangements, as well as Shared Services Canada's Standing Offers.

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 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](#).

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 Committee has continued to integrate the Code into its procurement practices, with a view to safeguarding federal procurement supply chains from forced labour and child labour.

The Committee has also discontinued using suppliers such as online marketplaces to further diminish the potential risk associated with forced labour or child labour.

Identifying parts of the 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 Committee does not currently have departmental measures in place to assess the risk of forced labour and child labour in its supply chains. However, the Committee is committed to working with stakeholders and federal partners to improve its knowledge and expertise in assessing the risks of forced labour and child labour in its activities and supply chains.

In the absence of its own departmental risk assessment, the Committee has reviewed the risk assessment conducted for goods purchased specifically by PSPC and used the results to determine whether some of the goods purchased by Committee may be at risk of using forced labour or child labour. The risk assessment concluded that office supplies and electronic equipment components were some of the goods purchased by PSPC at highest risk of human trafficking, forced labour, and child labour.

The Committee is monitoring PSPC's follow-up actions related to the findings of the risk assessment, including the development of a Policy on Ethical Procurement.

Measures taken to remediate any forced labour or child labour

To date, the Committee 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 chain. The Committee is committed to following best practices as it continues to develop the capacity to identify and respond to forced labour and child labour risks.

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 Committee 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, and therefore no remediation measures have been implemented.

Training provided to employees on forced labour and child labour

The Committee 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.

The Committee, as a micro-organization with limited resources, will continue to leverage resources and training material being developed by PSPC.

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

While the Committee does not currently have policies and procedures in place to assess the effectiveness of the steps taken to ensure that forced labour and child labour are not being used in its activities and supply chains, it will leverage the steps taken by PSPC in their established Standing Offers and Supply Arrangements. The Committee regularly reviews policy provided by PSPC related to forced labour and child labour and adapts to any changes as needed.

Approvals

This 2025 Annual Report under *the Fighting Against Forced Labour and Child Labour in Supply Chains Act* is approved by:

Miguel Adam, CPA

Acting Director General, Corporate Services and Chief Financial Officer

Kelly Walsh

Chairperson and Chief Executive Officer