



Parks Canada  
Fighting Against Forced Labour and Child Labour  
in Supply Chains Act

**2024 – 2025 Report Period**



## **ABOUT THIS REPORT**

The [\*Fighting Against Forced Labour and Child Labour in Supply Chains Act\*](#) came into force on January 1, 2024. The Act stipulates that any government institution producing, purchasing or distributing goods in Canada or elsewhere must, on or before May 31 of each year, submit a report to the Minister of Public Safety. The report must detail the steps the government institution has taken during 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.

Consequently, Parks Canada has created and submitted this annual report, for the fiscal year 2024 – 2025, to the Minister of Public Safety on the steps it has taken to prevent and reduce the risk that forced labour or child labour is used at any step of the production of goods, purchased or distributed by Parks Canada.

As per section 8 of the Act, this report has been made available to the public, including by publishing it in a prominent place on Parks Canada's website. In addition, per section 22 of the Act, Parks Canada's annual reports will be held in an electronic registry on the Public Safety Canada (PSC) website that is accessible to the public.

More detailed information on the Act and reporting obligations can be found on PSC's [website](#).



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## **ABOUT PARKS CANADA**

Parks Canada is a federal agency with the mandate to protect and present nationally significant examples of Canada's natural and cultural heritage, and foster public understanding, appreciation and enjoyment in ways that ensure the ecological and commemorative integrity of these places for present and future generations.

As the caretakers of one hundred and seventy-one national historic sites, forty-eight national parks, five national marine conservation areas and one national urban park, Parks Canada purchases various goods and services primarily related to the operational maintenance of these sites within Canada. These include, but not limited to, the procurement of exhibit displays, vehicles for the maintenance of national parks, historic site preservation, campground maintenance, wildlife monitoring, environmental remediation activities, highway maintenance and construction, the conservation of Canadian historical artefacts, as well as construction and maintenance of visitor and operational buildings (e.g., visitor centers, washrooms, maintenance compounds).

## **PROCUREMENT STRUCTURE, ACTIVITIES AND SUPPLY CHAINS**

Parks Canada has a centralized approach to procurement, with the Procurement, Grants and Contributions Branch under the Chief Financial Officer Directorate delivering centralized procurement and contracting services to Parks Canada for contracts over \$10,000 and \$25,000. For procurements under these values, it is a decentralized procurement framework.

Procurement activities are managed by a framework that ensures programs run smoothly and achieve the best value, while considering socio-economic, environmental, and Indigenous goals. Governance, clear roles, processes, systems, controls, and reporting help maintain fair, open, and transparent procurement activities.

Parks Canada has delegated emergency contracting authority as well as authority to purchase goods, services, construction and architectural and engineering services. Any requirement that falls outside of Parks Canada delegation is done through common services providers such as Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) if a Standing Offer or Supply Arrangement is not available for the commodity.

Parks Canada procured approximately \$76M\* of goods between April 1<sup>st</sup>, 2024, to March 31, 2025. Approximately 50% of this value was made by leveraging either an SSC or



PSPC Standing Offer or Supply Arrangement.

Goods that are frequently procured by Parks Canada include fuel & firewood, uniforms, Information Technology and related equipment, passenger motor vehicles, lumber and millwork.

\*This value does not include low dollar value purchases made using acquisition cards or any goods purchased under construction services.

## **STEPS TO PREVENT AND REDUCE THE RISK OF FORCED OR CHILD LABOUR**

Parks Canada is making active efforts to prevent and mitigate the risks associated with forced labour and child labour in its procurement processes.

Parks Canada continues to use PSPC's anti-forced labour clauses and PSPC's Code of Conduct, which outlines obligations for contractors and their subcontractors that prohibits them from engaging in practices related to human trafficking, forced labour and child labour, in all contracts to ensure that contracts can be terminated where there is evidence that the goods have been produced in whole or in part by forced labour or human trafficking.

In addition, to prevent and reduce the risk of forced labour or child labour in its procurements, Parks Canada has used SSC and PSPC's tools, which have all been amended to include PSPC's anti-forced labour clauses and PSPC's Code of Conduct.

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](https://canada.ca). Parks Canada will use PSPC's awareness materials to guide suppliers and safeguard supply chains from forced labour and child labour. Furthermore, procurement personnel will be referred to these materials for awareness.

On February 26, 2025, Parks Canada procurement specialists attended an International Contracting Officers Forum on Principles to Guide Government Action to Combat Human Trafficking in Global Supply Chains. This session provided several tangible resources that could be used by contracting officers to aid in identifying commodities that are susceptible to Human Trafficking and Forced Labour. Parks Canada will use these materials to create procurement processes to guide procurement staff on how to identify and minimize the potential use of forced labour and child labour in supply chains.



Going forward, Parks Canada is committed to building on its action plan to implement some practical measures for contracting officers to mitigate key areas of risk of forced labour and child labour in supply chains like electronic equipment and clothing and textiles.

## **POLICIES AND DUE DILIGENCE PROCESSES**

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 the aforementioned amendments, Parks Canada has integrated the Code into its procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that Parks Canada has awarded included the Code through the General 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 and applies to all imports, regardless of origin.

## **ACTIVITIES AND SUPPLY CHAINS THAT CARRY A RISK OF FORCED LABOUR OR CHILD LABOUR**

In May 2021, a risk analysis of PSPC’s supply chains was completed by the Rights Lab, of the University of Nottingham (United Kingdom), to determine which goods were at the highest risk of exposure to human trafficking, forced labour, and child labour.

The findings of the report conducted by PSPC were used as the foundation to initiate an internal analysis at Parks Canada to identify the goods which are likely at risk of exposure to forced labour and child labour. Parks Canada took note of the findings and



recommendations of this risk analysis, and is monitoring related follow-action, including the implementation of the [Policy on Ethical Procurement](#) and the development of a human rights due diligence framework.

Furthermore, Parks Canada uses tools from SSC, who 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**

Parks Canada has not identified any instances where remediation of any forced labour or child labour was required, as no cases were identified in fiscal year 2024 – 2025. Parks Canada continues to assess and monitor the situation and guidance for remediation will be established as needed.

## **MEASURES TAKEN TO REMEDIATE LOSS OF INCOME**

Parks Canada did not identify any cases requiring remediation during the fiscal year 2024-2025. As the development of processes and tools to identify and mitigate risks of forced or child labour continues, strategies to compensate the most vulnerable families affected by these measures will be explored.

## **TRAINING**

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

Parks Canada will continue to create awareness for their contracting authorities through the provision of information sessions and updates during regular team meetings.

## **ASSESSMENT OF EFFECTIVENESS**

Parks Canada presently lacks established policies and procedures to evaluate its effectiveness in preventing the use of forced labour and child labour within its operations and supply chains. Upon the development and implementation of these measures by PSPC, Parks Canada will adopt them to support a comprehensive agency-wide strategy aimed at formulating its own monitoring and assessment framework.



## **MOVING FORWARD**

In response to the coming-into-effect of the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (January 2024), Parks Canada remains committed to increasing awareness, conducting fair, open, and transparent procurement processes, and reviewing, amending and improving business practices as a whole.



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