

## **Annual Report on the Application of the Fighting Against Forced Labour and Child Labour in the Supply Chains Act, 2024-2025**

### **About this report**

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act) came into force on January 1, 2024 imposing reporting obligations on government institutions producing, purchasing or distributing goods in Canada or elsewhere. The Act also requires the report be made available to the public.

Forced labour can be found in every country and all economic sectors. The International Labour Organization has estimated that approximately 27.6 million victims of forced labour exist worldwide. It is rooted in poverty, discrimination and lack of social protection. It also disrupts fair competition between businesses.

The Canadian Centre for Occupational Health and Safety (CCOHS) is providing its first annual report, covering the period April 1, 2024, to March 31, 2025, pursuant to the Act.

### **About the Canadian Centre for Occupational Health and Safety (CCOHS)**

CCOHS is a federal departmental corporation that serves Canadians with credible and relevant tools and resources to improve workplace health and safety. We believe that all Canadians have a fundamental right to a healthy and safe working environment. Through our programs, services, knowledge, commitment and action, CCOHS continues its efforts to advance health and safety in the workplace.

CCOHS procurement activities relate to the purchasing and distributing of goods within Canada. Specifically, the purchasing of goods is primarily related to internal business operations. The majority of purchases include IT software and hardware for business operations (e.g., Microsoft products, cloud services, laptops, tablets, monitors, keyboards and other peripheral IT equipment).

In addition, CCOHS distributes publication materials across Canada in the form of physical and digital assets. Physical assets are developed internally and printed and shipped using local print and logistics vendors in Ontario.

**Structure, activities and Supply Chains**

CCOHS 2024-2025 annual expenditures for IT software and hardware is approximately \$825,000 and relies on Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) to use procurement instruments such as Standing Offers and Supply Arrangements etc. The use of these procurement instruments allows CCOHS to leverage their work on the Act, including having suppliers comply with the Government of Canada’s Code of Conduct for Procurement.

**Steps to prevent and reduce the risk of forced or child labour**

Given the recent coming into force date of the Act, CCOHS is reviewing internal procurement and distribution policies to make appropriate updates related to forced labour and child labour. CCOHS does not currently have stand-alone policies or due diligence processes in place.

CCOHS has reviewed internal activities but has not completed an in-depth, researched, review of supply chains that carry a risk of forced labour and/or child labour being used. In terms of any measures to remediate any forced labour or child labour in its activities and supply chains, this is not applicable, as CCOHS has not identified any forced labour or child labour in its activities and supply chains.

Regarding any measures to remediate the loss of income to the most vulnerable families that results from preventing the use of forced or child labour, CCOHS 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.

**Policies and processes**

CCOHS relies on PSPC and SSC efforts for the majority of CCOHS procurement activities across the organization.

PSPC includes 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. As well, Standing Offers and Supply Arrangements for goods requires suppliers to comply with international labour standards which prohibit forced and child labour.

PSPC General Conditions clauses are included in solicitation and contractual documents integrate the PSPC Code of Conduct for Procurement (the "Code"). The Code outlines expectations and obligations for contractors and their subcontractors who respond to bid

solicitations and prohibits them from engaging in practices related to human trafficking, forced labour and child labour. CCOHS is reviewing relevant clauses in on-going contracts to address the fight against forced labour and child labour.

CCOHS does not currently have departmental policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its supply chains.

**Training**

CCOHS does not currently provide training to its employees on forced labour and child labour. CCOHS plans to include relevant information about the Act in its training and awareness materials for employees involved in procurement activities in 2025–2026.

**Moving forward**

Going forward, CCOHS is committed to exploring provincial, territorial and federal government best practices to better understand key areas of risk of forced labour and child labour in our supply chains and implement processes to mitigate these practices. CCOHS recognizes the responsibility to ensure that the use of forced labour and child labour practices are eliminated from our supply chains.