



# Annual report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Department of Justice Canada  
[2025/2026 Reporting Year]

## 1. Structure, activities and supply chains

The Department of Justice Canada has the mandate to support 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 laid out the roles and responsibilities of the Department as well as those of the Minister of Justice and Attorney General of Canada.

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 helps to ensure a fair, relevant and accessible justice system for all Canadians.
- a provider of a range of legal advisory, litigation and legislative services to government departments and agencies; and
- a central agency responsible for supporting the Minister in advising Cabinet on all legal matters.

The Department of Justice is headed by the Deputy Minister, who provides advice and support to the Minister and acts as the main interface between the political and administrative functions of government.

The Department of Justice is a medium-sized department with around 5,000 employees. Roughly one half of departmental staff are lawyers. The other half is made up of a broad range of professionals, including paralegals, social scientists, program managers, communications specialists, administrative services personnel, Information Technology service professionals, and financial officers.

The Department delivers services through a mix of co-located departmental legal services units, specialized branches located within the Department of Justice and a network of six regional offices located across the country.

The Department of Justice Canada undertakes a wide range of procurement activities to support its operational and legal mandates, including the purchase of both goods and services within Canada. While the Department procures various categories of goods, such as office furniture, information technology equipment, and software, the majority of its contract values are for service-based requirements. These service contracts primarily include professional services, expert witness services, and other specialized expertise essential to the delivery of the Department's programs and legal responsibilities. The Department manages its procurement activities in accordance with a suite of government acts and policies, such as Government Contracts Regulations, Directive on the Management of Procurement etc.

During the reporting period, the Department held a total contract value of \$37.8 million. Of the \$37.8 million, 77% accounted for services purchases, and 23% for goods purchases. Among the

goods purchases, 77% of goods were purchased from vendors within Canada while the remaining 23% were from vendors outside of Canada.

### **1.1. Goods purchased under the Department's own procurement authority without using Public Services and Procurement Canada (PSPC) or Shared Services Canada (SSC) procurement tools)**

During this reporting period, the Department purchased goods under its own procurement authority without using PSPC or SSC procurement tools in the following key instances:

Software and Software licenses: \$293K

Office furniture and furnishings: \$34K

Computer equipment: \$8K

### **1.2. Goods purchased using PSPC procurement tools**

At the Department of Justice Canada, approximately 66% of the annual value of the Department's goods purchases are made through PSPC tools such as Standing Offers and Supply Arrangements.

Since November 2021, PSPC has implemented anti-forced labour clauses in all goods contracts to add a requirement for contractors to not deliver or sell goods to Canada manufactured wholly or in part by forced labour. The clauses ensure that Canada 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 of the Department'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.

### **1.3. Goods purchased using SSC procurement tools**

At the Department of Justice Canada, approximately 14% of the annual value of the Department's goods purchases were made through 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 of the Department's 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.

## 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](http://canada.ca) website.

The Department of Justice Canada has used PSPC's awareness material to guide its suppliers and safeguard its supply chains from forced labour and child labour. Furthermore, the Department refers its procurement personnel to this material for awareness.

The April 1, 2023 amendments to the Treasury Board Directive on the Management of Procurement required 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 through the General Conditions for goods.

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.

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.

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**

The Department of Justice Canada has not yet conducted a comprehensive analysis to identify risks within its procurement activities and supply chains. Given that the majority of the Department’s purchases of goods are made using Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) procurement instruments, the Department relies significantly on the policy frameworks and oversight mechanisms established by these organizations. The Department will continue to monitor PSPC and SSC assessments of goods within their supply chains that present elevated risk levels and will take appropriate actions in response to those findings.

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 recommended 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 follow-up action, including the development and implementation 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.

## **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**

PSPC has developed an online self-paced course for procurement officers titled "Introduction to Ethical Procurement". The course is available to federal public servants on the Canada School of Public Service's learning platform as of November 2025. During the 2025 to 2026 fiscal year, the Department of Justice Canada has encouraged all procurement personnel to take this training course.

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 May 2025, PSPC hosted a webinar combatting Human Trafficking in Government Procurement Practices.

## **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.