



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

April 2026



## Submission Information

### **Fisheries and Oceans Canada (DFO) - 2026 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act***

This report is submitted on behalf of DFO and covers activities from April 1, 2025, to March 31, 2026.

An Order in Council issued on September 2, 2025, transferred responsibility for the Canadian Coast Guard (CCG) from Fisheries and Oceans Canada to the Department of National Defence (DND). Accordingly, this scope of this report includes CCG activities and information only up to September 2, 2025.

## Description of the government institution's structure, activities and supply chains

**Indicate which of the following describes your government institution's structure:**

- Federal department or agency


**Describe how your government institution engages in the following activities:**

- Purchasing goods
  - in Canada
  - outside Canada

Fisheries and Oceans Canada's (DFO) mandate is set out in the *Department of Fisheries and Oceans Act*, which gives DFO responsibilities for:

- sustainably managing fisheries and aquaculture
- working with fishers, coastal and Indigenous communities to enable their continued prosperity from fish and seafood
- ensuring that Canada's oceans and other aquatic ecosystems are protected from negative impacts
- ensuring commercial vessels and recreational boaters can safely navigate our waters
- being there to save lives and protect our environment when emergencies arise

DFO is designated as a department of the Federal Public Administration by Schedule I of the Financial Administration Act (FAA) and, as such, is subject to the Government of Canada's legislative and policy framework for contracting and procurement. Therefore, DFO's procurement and contracting practices are governed by a legislative policy framework, which includes the FAA, the Government Contracts Regulations, the Treasury Board (TB) Policy on the Planning and Management of Investments, the TB Directive on the Management of Procurement and the TB Guidelines on the Proactive Disclosure of Contracts.

Departmental contracting authority is referenced in the Delegation of Spending and Financial Authorities. Most of the contracting authorities are delegated to positions in Procurement Services and selected Designated Procurement Officials (Business Owners). Designated Procurement Officials are operational managers who have been sub-delegated specific contracting authorities to facilitate operations. Procurement Services is responsible for providing adequate training and support.

Procurement and contracting activities in DFO are partially decentralized. Procurement activities above Business Owners' contracting delegation and within departmental limits are executed within DFO Procurement Services. Contracts (including amendments) with amounts in excess of departmental limits must be requisitioned through Public Services and Procurement Canada (PSPC) or Shared Services Canada (SSC).

Procurement of goods below \$10,000 are typically procured and paid via acquisition cards. PSPC is responsible for procuring goods above \$25,000 where no standing offer or supply arrangement exist.

Between April 1, 2025, and March 31, 2026, DFO procured goods with a total awarded contract value of \$182.4 million. These contracts were awarded using both the departmental procurement authority as well as Common Service Providers (PSPC and SSC) when departmental authorities



were exceeded. Under its departmental contacting authority, DFO issued contracts for goods valued at \$15.9 million broken down across the following top 10 commodities (by contract value):

| Commodity Description                                                              | Contract Value |
|------------------------------------------------------------------------------------|----------------|
| Laboratory and scientific equipment                                                | \$3,242,451.52 |
| Structures and Building and Construction and Manufacturing Components and Supplies | \$903,507.22   |
| Electronic charts or maps or atlases                                               | \$772,400.00   |
| Software                                                                           | \$577,638.63   |
| Fishing and aquaculture equipment                                                  | \$551,089.30   |
| Food Beverage and Tobacco Products                                                 | \$481,602.24   |
| Laboratory supplies and fixtures                                                   | \$443,171.93   |
| Radio frequency data communication equipment                                       | \$297,738.00   |
| Lubricants and oils and greases and anti corrosives                                | \$293,923.85   |
| Buoy                                                                               | \$286,129.74   |

The majority of the goods procured under DFO's contracting authority are awarded to Canadian vendors. In total, 89% of the total number of contracts awarded and 85% of contract value were awarded to Canadian vendors.

During fiscal year 2025-26, approximately 37% of the annual value of our goods purchases were made through the use of PSPC tools such as Standing Offers and Supply Arrangements.

In November 2021, PSPC 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, all PSPC Standing Offers and Supply Arrangements for goods that have been issued, amended, or refreshed since November 20, 2023, include anti-forced labour clauses.

Accordingly, all DFO contracts for goods resulting from the use of these tools include contractual clauses relating to forced labour which set out, among other things, human rights and labour rights requirements. Similarly, when DFO procures goods independently, it applies PSPC approved contractual templates and clauses to ensure alignment with federal contracting requirements and to reinforce its commitment to preventing forced labour in supply chains.

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



DFO applies and implements all directives and guidelines set out in the Directive on the Management of Procurement, including requirements relating to the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*.

DFO has integrated PSPC's Standard Contract Clauses including PSPC's Code of Conduct for Procurement and anti-forced labour clauses in its purchasing activities to prevent and reduce the risk of forced or child labour in its purchasing activities. In addition, to prevent and reduce the risk of forced labour or child labour in our procurements, DFO has used the following list of PSPC's tools:

- Standing Offers
- Supply Arrangements
- Anti-forced labour contract clauses in our departmental contracting templates

To support compliance with the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, DFO Procurement Services continues to use its mandatory Procurement Intake Form to identify any known forced labour or child labour risks within the supply chain of goods being procured. This measure supports early risk identification, systematic tracking of potential risks, and increased awareness of departmental awareness of obligations under the Act.

In addition to this enhancement, DFO Procurement Services undertook broader efforts to strengthen awareness and support early identification of potential forced labour and child labour risks. Procurement staff received targeted guidance and reminders on their responsibilities under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*, and contracting officers were encouraged to engage with clients early in the planning process to discuss potential supply chain concerns. Responses captured through the Procurement Intake Form were monitored to identify emerging trends or areas requiring further attention, and observations were shared with procurement staff and management accordingly. Collectively, these actions supported a more consistent and proactive approach to identifying and mitigating forced labour and child labour risks in DFO procurement activities.

By integrating this requirement into the intake process, DFO Procurement Services contributed to improved monitoring of supply chain integrity and supported broader efforts to prevent and reduce the risks of forced labour and child labour in procurement activities.

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://www.canada.ca).

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.

Pursuant to the aforementioned amendments, DFO has continued to integrate the Code into our procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that DFO has awarded included the Code through the General Conditions for goods.

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.

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



DFO has initiated work to identify the parts of its activities and supply chains that may carry a risk of forced labour or child labour; however, this assessment remains in progress and some gaps still exist. Over the past year, the department continued to build its understanding of potential risk areas by reviewing procurement categories, monitoring responses to the Procurement Intake Form, and aligning its approach with emerging government-wide guidance. While this work has helped clarify where risks may be more likely to occur, further analysis is required before DFO can fully map and validate all potential areas of exposure.

At this stage, no specific high-risk supply chain areas have been formally identified; however, the department is actively monitoring responses to the Procurement Intake Form and reviewing procurement categories to determine where risks may be more likely to occur.

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.

DFO reviewed and relied on the supply chain risk assessment conducted by PSPC in May 2021 to inform its understanding of potential exposure to human trafficking, forced labour, and child labour within federal procurement activities. DFO familiarized itself with the findings of the assessment, monitored related follow-up actions, and aligned its approach with PSPC's Policy approach on Ethical Procurement. The risk analysis was used as a reference point to assess the nature of goods procured during the 2025–26 fiscal year. Based on this assessment, DFO determined that certain categories of goods carry an inherent risk due to the type of products sourced, with lab and scientific equipment identified as having the highest relative risk within applicable supply chains.

**Indicate whether any particular sectors and/or industries were identified as having risks of forced labour or child labour. For example, whether your government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries:**

No, DFO has not identified any instances of forced labour or child labour in the department's activities and supply chains.

[Measures taken to remediate any forced labour or child labour](#)



**Indicate whether your government institution has taken any measures to remediate any forced labour or child labour in its activities and supply chains. For example, you may include one of the following statements:**

DFO has not identified any forced labour or child labour in its activities and supply chains.

Although DFO has not identified any instances of forced labour or child labour within its activities or supply chains, the department continues to monitor for potential risks through its procurement processes. Contracting officers review information provided through the Procurement Intake Form, apply government-wide guidance on high-risk goods, and remain attentive to any indicators that may warrant further examination. This ongoing vigilance supports DFO's commitment to ethical procurement and ensures that, should any concerns arise, appropriate steps can be taken to assess and address them.

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

**Indicate in your report whether your government institution has taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced or child labour in its activities and supply chains.**

DFO 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. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.

Training provided to employees on forced labour and child labour

**Indicate whether your government institution currently provides training to employees on forced labour and/or child labour.**

Yes. DFO provides training and awareness raising activities to employees on forced labour and child labour. Over the past year, DFO delivered voluntary training and information sessions to strengthen awareness of obligations under the *Fighting Against Forced Labour and Child Labour Supply Chains Act* and to support identification of potential risk indicators.

In addition, forced labour and child labour awareness is integrated into DFOs standard procurement training for its employees, including the Procurement Fundamentals training course. DFO employees were also encouraged to complete the PSPC online self-paced course, Introduction to Ethical Procurement, available through the Canada School of Public Service as of November 2025, to further support ethical procurement practices.





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

**Indicate whether your government institution currently has 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. If applicable, describe the methods used by your government institution to assess its effectiveness.**

In the current reporting period, DFO has focused on building foundational awareness of forced and child labour risks by providing training to its employees. This training aims to equip staff with the knowledge and skills necessary to identify and address such risks in supply chain activities. While DFO has yet to implement audits, risk assessments, supplier policies, or remedial measures, these initiatives are under development as part of its long-term strategy to ensure compliance with labour standards.