



Canadian Radio-television and
Telecommunications Commission

Conseil de la radiodiffusion et des
télécommunications canadiennes

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Forced labour in Canadian supply chains 2023-2024



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Part 1: Identifying information

- **Name of government institution:** Canadian Radio-television and Telecommunications Commission (CRTC)
- **Financial reporting year (start date, end date):** This report covers the activities undertaken during the CRTC's April 1, 2023 – March 31, 2024, financial year.

Part 2: Report contents

2.1 Information on the government institution's structure, activities and supply chains

Which of the following accurately describes the government institution's activities?

The CRTC as a government institution only purchases goods:

- in Canada
- outside Canada

Provide additional information on the government institution's structure, activities and supply chains.

The CRTC is an administrative tribunal that is responsible for regulating and supervising Canada's communications system in the public interest.

Established to develop, implement, and enforce regulatory policies on the Canadian communications system, the CRTC performs a wide range of functions, including rule making and policy development. It has the quasi-judicial powers of a superior court with respect to the production and examination of evidence and the enforcement of its decisions. As an administrative tribunal it operates at arm's length from the federal government.

The CRTC's forecasted expenditures for 2023-24 were slightly under \$100M including revenue spending authorities with approximately 630 forecasted full-time employees.

As a small organization, the CRTC spends a relatively small amount on goods. For example, last fiscal year we spent \$1.7M on goods which is only 12% of our overall O&M expenses, most of which go towards professional services.

CRTC's purchases are done through Public Services and Procurement Canada (PSPC) and Shared Services Canada (SSC) procurement tools in the following categories:

Office Supplies, Office Furniture, IT Equipment, and Online Subscriptions for Data and Newsletters. CRTC does not have information about where the goods come from.

The CRTC relies on PSPC standard tools and is therefore limited in the information we can provide.

The CRTC purchases mainly office supplies, office furniture and ergonomic seating through the Standing Offers and Supply Arrangements established by PSPC, while IT equipment is procured through SSC. The CRTC also procures goods as subscriptions for newsletters and various data related to our mandate.

2.2 Information on the steps taken 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

Indicate steps taken in the 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.

The CRTC has integrated PSPC's updated General Conditions for goods contracts and PSPC's Code of Conduct for Procurement in our purchasing activities. In addition, to prevent and reduce the risk of forced labour or child labour in our procurements, the CRTC has used the following list of PSPC's tools:

- Standing Offers
- Supply Arrangements
 - ProServices
 - Shared Services Canada
 - GC Cloud Services
- Anti-forced labour contract clauses as per policy notification 150 – Anti-forced labour requirements.

2.3 Information on the policies and due diligence processes in relation to forced labour and child labour

Does the government institution currently have policies and due diligence processes in place related to forced labour and/or child labour? (Yes or No)

No

Effective April 1, 2023, amendments to the Treasury Board Directive on the Management of Procurement require contracting authorities from all departments to incorporate the Code of Conduct for Procurement (“the Code”). Specifically, this applies to 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. The CRTC has integrated the Code into our procurement activities, with a view to safeguarding federal procurement supply chains from forced labour and child labour. All contracts awarded by our organization have included the Code as part of 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 (CUSMA) and applies to all imports, regardless of origin.

2.4 Information on the parts of its activities and supply chains that carry a risk of forced labour or child labour being used and the steps taken to assess and manage that risk

Has the government institution identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used?

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. We have familiarized

ourselves with information on the risk assessment provided by PSPC, and are monitoring related follow-up actions, including the development of a Policy on Ethical Procurement.

2.5 Information on any measures taken to remediate any forced labour or child labour

Has the government institution taken any measures to remediate any forced labour or child labour in its activities and supply chains?

Not applicable, as we have not identified any forced labour or child labour in our activities and supply chains.

2.6 Information on any 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

Has the government institution 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?

Not applicable, as we have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and supply chains.

2.7 Information on the training provided to employees on forced labour and child labour

Does the government institution currently provide training to employees on forced labour and/or child labour? (Y/N)

No. However, the CRTC is aware that PSPC is currently raising awareness and developing guidance materials (including risk mitigation strategies) for suppliers, targeted towards high-risk sectors. We are monitoring the development of these materials and will leverage these resources upon their publication. In the meantime, the

CRTC promotes related training as available via the CSPA. The organization has not developed its own specific training on this topic.

2.8 Information on how the government institution assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

Does the government institution currently have 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? (Yes or No)

No