



Office of the Commissioner
of Lobbying of Canada

Commissariat au lobbying
du Canada

Forced Labour in Canadian Supply Chains

ANNUAL REPORT 2025-26

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Introduction

Senate Public Bill S-211, [*An Act to enact the Fighting Against Forced Labour and Child Labour in Supply Chains Act and to amend the Customs Tariff*](#), came into force on January 1, 2024.

This Act requires that the head of every government institution whose activities include producing, purchasing or distributing goods in Canada, or elsewhere, submit an annual report to the Minister of Public Safety on, or before, May 31 of each year.

This report provides the steps taken by the Office of the Commissioner of Lobbying (OCL) to prevent or reduce the risk that forced labour or child labour is used at any step of the production of goods purchased during the 2025-26 fiscal year.

Structure, activities and supply chains

STRUCTURE OF THE OFFICE OF THE COMMISSIONER OF LOBBYING

The federal lobbying regime sets requirements and standards for the transparent and ethical lobbying of federal officials. The Commissioner of Lobbying with the support of the Office administers the *Lobbying Act* and the *Lobbyists' Code of Conduct*.

Our primary responsibilities include:

- maintaining and enhancing the Registry of Lobbyists
- expanding awareness and understanding of the lobbying regime and compliance obligations through education
- conducting compliance work that supports respect of federal lobbying requirements

The Office of the Commissioner of Lobbying is a micro-organization of 35 full-time equivalents (FTEs) that supports the Commissioner in achieving her mandate.

PROCUREMENT ACTIVITIES AND SUPPLY CHAINS

The OCL has a total budget of approximately \$5.7M. Most of OCL's budget is spent on salary expenses.

In 2025-26, the OCL spent \$1.4M on Operations and Maintenance for goods and services. Excluding Memorandum of Understandings (MOU), the OCL spent a total of \$772K on contracts. From that amount, \$112K was spent for goods purchased through 15 commitments (purchase orders, call-ups against standing offers, procurement arrangements and contracts).

During the last fiscal year, the OCL purchased the following types of goods:

- Communications Security Equipment and Components
- Radio and Television Communication Equipment, Except Airborne
- Video Recording and Reproducing Equipment
- Miscellaneous Communication Equipment
- Miscellaneous Alarm, Signal, and Security Detection Systems
- Information Technology Central Processing Unit (CPU, Computer), Digital
- Information Technology Input/Output and Storage Devices
- Information Technology Software
- Office Furniture
- Office Supplies
- Stationery and Record Forms
- Books, Maps, and Other Publications

Table 1. Types of goods

GSIN Number	Types of goods	Numbers of contracts	Total cost by types of purchase	% of total purchases by types
N5810	Communications Security Equipment and Components	1	9 670\$	8,63%
N5820	Radio and Television Communication Equipment, Except Airborne	1	34 600\$	30,87%
N5836	Video Recording and Reproducing Equipment	1	752\$	0,67%
N5895	Miscellaneous Communication Equipment	1	784\$	0,70%
N6350	Miscellaneous Alarm, Signal, and Security Detection Systems	1	1 251\$	1,12%
N7021	Information Technology Central Processing Unit (CPU, Computer), Digital	2	60 567\$	54,05%
N7025	Information Technology Input/Output and Storage Devices	1	327\$	0,29%
N7030	Information Technology Software	1	1 485\$	1,33%

N7110	Office Furniture	1	1 151\$	1,03%
N7510	Office Supplies	2	705\$	0,63%
N7530	Stationery and Record Forms	1	65\$	0,06%
N7600	Books, Maps, and Other Publications	2	709\$	0,63%

At the OCL, approximately 97% of the annual value of our purchases were made through the use of Public Services and Procurement Canada (PSPC) tools such as Standing Offers and Supply Arrangements.

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

As such, all of our 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. These clauses can be found in the [policy notification 150 – Anti-forced labour requirements](#).

Policies and due diligence processes

Effective since 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, the OCL has integrated the Code into our procurement processes, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that our organization 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 (CUSMA) and applies to all imports, regardless of origin.

In 2025-26, the OCL continued to work with its procurement provider, the Parole Board of Canada, to prevent and reduce risks that forced labour or child labour is used at any steps of the purchasing of goods.

Forced labour and child labour risks

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.

Following this analysis, it was identified that goods purchased in the following categories at the OCL represent a risk for forced labour and child labour:

- Office Supplies and Devices

In 2025-26, the OCL spent a total of \$770 for these types of goods, representing 0.69% of all goods purchased.

The OCL took note of the findings and recommendations of this risk analysis, and are monitoring related follow-action, including the implementation of PSPC's Policy on Ethical Procurement and the development of a human rights due diligence framework that is currently underway.

Remediation measures

As mentioned previously, in 2025-26, the OCL continued to work with its procurement provider, the Parole Board of Canada, to prevent and reduce risks that forced labour or child labour is used at any steps of the purchasing of goods.

In 2026-27, the OCL will work with its new procurement provider, the Canadian Human Rights Commission (CHRC), to prevent and reduce risks that forced labour or child labour is used at any steps of the purchasing of goods.

Remediation of loss of income

In 2025-26, the OCL, a micro-organization with limited resources, has not 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 labour or child labour in the organisation's activities and supply chains.

Training

In 2025-26, the OCL, a micro-organization with limited resources, has not developed any training or awareness material.

In 2026-27, the course "Introduction to Ethical Procurement (CHC118) offered by the School of Public Service will be mandatory to all Directors, Managers and the Financial Analyst.

Assessing effectiveness

In 2025-26, the OCL, a micro-organization with limited resources, has not developed any methods to assess the effectiveness of its initiatives to reduce or eliminate the risks of forced labour or child labour.