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2025-2026 Report Against Forced Labour in Canada Supply Chains

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Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("*Supply Chains Act*") and an amendment to the Customs Tariff, was enacted on January 1, 2024. This legislation mandates that the leaders of all government institutions involved in the production, procurement or distribution of goods, whether domestically or internationally, must submit an annual report to the Minister of Public Safety no later than May 31 each year.

The RCMP External Review Committee (ERC) is subject to reporting requirements as per section 5 of the Supply Chains Act and therefore must report on steps taken during its previous financial year to prevent and reduce the risk that forced labour or child labour was used at any step of the production of goods produced, purchased or distributed by the organization.

The following report presents the ERC procurement context and measures in place during the fiscal year 2025-26 (April 1, 2025, to March 31, 2026) that contribute to preventing and reducing the risk that forced labour or child labour is used at any step of the production of goods produced, purchased or distributed by the organization.

Structure, activities and supply chains

About RCMP External Review Committee

The ERC is an independent quasi-judicial statutory tribunal established under the *Royal Canadian Mounted Police Act*. It is separate and distinct from the Royal Canadian Mounted Police (RCMP) itself, reporting to Parliament through the Minister of Public Safety. Due to its specific and narrow mandate, the ERC has one office located in National Capital Region, Ontario, Canada.

The ERC impartially reviews appeals of certain decisions made within internal RCMP labour relations processes and provides findings and recommendations to the Commissioner of the RCMP, thereby supporting transparency, fairness, and accountability in the RCMP's internal decision-making processes.

Procurement activities and supply chains

As a micro-organization with fewer than 50 full-time equivalents, the ERC has a budget of \$6.1M, approximately 75% of which is dedicated to personnel costs. The ERC's purchasing needs primarily relate to common office goods and services, which are generally procured through Public Services and Procurement Canada (PSPC) established Supply Arrangements and Standing Offers, as well as the Shared Services Canada (SSC) Standing Offers for IT equipment.

While PSPC and SSC support federal departments in their daily operations as the central purchasing agents for the Government of Canada, the ERC also conducts procurement activities under its own delegated authority.

In 2025-26 fiscal year, the ERC acquired goods totaling \$67K, representing approximately 1% of its total budget and 4% of its \$1.5M Operating and Maintenance budget in the following commodity areas: Office Furniture, Office Supplies, Information Technology Central Processing Unit (CPU, Computer, Digital), and, Books, Maps and Other Publications.

Of these purchases, 49% were made through PSPC and SSC Standing Offers and Supply Arrangements, covering most operational requirements such as IT equipment, office supplies and furniture.

Under its own procurement authority, through low dollar value transactions the ERC acquired the remaining 51% of goods which were primarily legal publications required for program delivery and office supplies due to accommodation-related needs.

In 2025-26, all goods purchased by the ERC were procured from Canadian suppliers.

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

As a micro-agency with limited procurement activity and limited dedicated procurement resources, a Service Level Agreement (SLA) has been established with Parole Board of Canada (PBC) for the conduct of various procurement activities in accordance with applicable Government of Canada procurement policies, procedures, integrity requirements and broader procurement oversight practices.

For self-administered procurement activity, the ERC aligns its procurement practices with the Directive on the Management of Procurement and has integrated PSPC's updated General Conditions for goods contracts and PSPC's Code of Conduct for Procurement in its purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in procurement, the ERC has used PSPC tools such as Standing Offers and Supply Arrangements, as well as SSC's Standing Offers. Since November 2021, both PSPC and SSC have implemented anti-forced labour clauses in all goods contracts to ensure that they can terminate contracts where there is a 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 and all SSC Standing Offers for goods that have been issued, amended or refreshed include anti-forced labour clauses.

As such, all of the ERC's contracts for goods resulting from the use of PSPC and SSC's tools include PSPC and SSC's clauses relating to forced labour, which outline, among other things, human rights and labour rights requirements. Further the organization's approach in leveraging PBC support and expertise and reliance upon PSPC and SSC procurement vehicles remaining proportionate to organizational size, procurement complexity and Program requirements.

Policies and due diligence processes

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 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.

Pursuant to these amendments, the ERC had already integrated the Code into its procurement process. Since 2024-25, the ERC has secured access to subject matter expertise, through the established SLA with PBC to ensure that its contracts comply with the Treasury Board Directive on the Management of Procurement Directive, including the application of Code of Conduct for Procurement.

Forced labour and child labour risks

Given the organization's relatively small procurement volume and reliance on PSPC and SSC procurement instruments, the organization does not currently conduct formalized procurement-by-procurement forced labour risk assessments or supplier-level due diligence reviews.

Instead, the ERC primarily mitigates procurement risk through

- Use of PSPC and SSC procurement vehicles;
- Reliance on Government of Canada procurement policies and standard contractual clauses as identified in Annex 2.8 – Anti-forced labour requirements of the Supply Manual;
- Use of interdepartmental procurement support arrangements with PBC.

Where procurement activities involve greater complexity, specialized procurement expertise or operational considerations that may exceed internal capacity, the ERC leverages established procurement support arrangements.

The ERC recognizes that certain categories of goods may inherently carry elevated supply chain risks due to global manufacturing practices and supply chain complexity. As such, the ERC maintains awareness of Ethical Procurement guidance and the Human Rights Due Diligence framework.

Remediation of forced labour and child labour and loss of income to vulnerable families

Since the coming into force of the *Supply Chains Act* on January 1, 2024, the ERC has not identified any occurrences of forced labour, or child labour or loss of income to the most vulnerable families in its procurement activities and supply chains. Consequently, the ERC has not had to take any action to remedy the situation of forced labour, or child labour or loss of income to vulnerable families, but has taken measures to mitigate the risk of such occurrences through awareness, qualitative review and annual reporting.

Training

In 2025-26, the ERC supported awareness of ethical procurement and supply chain risks by ensuring those involved in procurement activity participated in awareness-raising webinars hosted by PSPC addressing human trafficking, forced labour, and child labour in supply chains. The ERC

continues to ensure that these materials, as well as supplementary training materials prepared by PSPC are provided to employees with roles and responsibilities in procurement.

Assessing Effectiveness

Given the organization's size, procurement profile and reliance on centrally administered Government of Canada procurement instruments, the ERC's current approach to assessing effectiveness is proportionate and primarily qualitative in nature.

The ERC currently assesses effectiveness through

- Continued reliance on PSPC and SSC procurement tools;
- Continued adherence to GoC procurement policies and procedures;
- Establishment of SLA with PBC for further procurement related expertise, guidance and oversight;
- Ongoing awareness of evolving ethical procurement expectations.

The ERC recognizes that approaches to effectiveness assessment may continue to evolve across the Government of Canada following advice and guidance from central agencies and intends to align any future improvements with operational realities, organizational risk and available resources.

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