



Military Grievances
External Review Committee

Comité externe d'examen
des griefs militaires

2026

Military Grievances External Review Committee – 2026 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

As required under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (the Act), which came into force on January 1, 2024, the Military Grievances External Review Committee (the Committee) has prepared this 2026 Annual Report on forced labour and child labour in Canadian supply chains.

This report outlines the risks of forced labour and child labour identified within the Committee's activities and supply chains, as well as the measures taken to assess, mitigate, and address those risks.

Prepared in parallel with the mandatory [online Questionnaire](#), this report provides information relevant to the Act's reporting requirements and supports the Committee's commitment to transparency and responsible procurement practices.

IDENTIFYING INFORMATION
<p>Name of government institution</p> <p>Military Grievances External Review Committee</p>
<p>Financial reporting year</p> <p>April 1, 2025 to March 31, 2026</p>
<p>Indicate if this is a report produced by a federal Crown corporation or a subsidiary of a federal Crown corporation</p> <p>The Committee is not a federal Crown corporation or a subsidiary of a federal Crown corporations.</p>

Structure, activities and supply chains
<p>The Committee is an independent administrative tribunal reporting to Parliament through the Minister of National Defence. The Committee reviews military grievances referred to it pursuant to section 29 of the <i>National Defence Act</i> and provides findings and recommendations to the Chief of the Defence Staff and the Canadian Armed Forces member who submitted the grievance.</p>

The Committee is a micro-organization operating with approximately 53 full-time equivalents, in Canada, supporting the Chairperson and Chief Executive Officer in fulfilling her mandate. In 2025-26, the Committee operated with a budget of \$8.9M, of which approximately 85% was allocated to salaries.

On average, the Committee spends \$1.1M annually on operating and maintenance costs. A significant portion of this amount covers rent, Memorandums of Understanding, and Service Level Agreements with other government departments. In 2025-26, the Committee spent \$0.3M on total contracts for goods and services.

While Public Services and Procurement Canada (PSPC) serves as the Government of Canada's central purchasing agent, the Committee carries out most of its procurement activities under its own delegated authority. At the Committee, approximately 80% of the annual value of our contracts were made through the use of PSPC tools such as Standing Offers and Supply Arrangements.

Since 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, 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.

During the 2025-26 fiscal year, the Committee purchased approximately \$140K in goods, including office supplies, furniture, and IT equipment, representing approximately 13% of its total operating and maintenance expenditures. The Committee's procurement activities include the acquisition of goods both within Canada and internationally.

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

The Committee has integrated PSPC's Standard Contract Clauses, including PSPC's Code of Conduct for Procurement and anti-forced labour clauses in our purchasing activities.

In addition, to prevent and reduce the risk of forced labour or child labour in procurement, the Committee primarily relies on PSPC Standing Offers and Supply Arrangements, as well as Shared Services Canada Standing Offers.

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.

The Committee has used PSPC's awareness materials to guide our suppliers and safeguard our supply chains from forced labour and child labour.

Furthermore, we are referring our procurement personnel to these materials for awareness.

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, the Committee has continued to integrate the Code into its procurement, 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 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 the 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 Committee does not currently have institution specific measures in place to identify risk. In the absence of a departmental risk assessment, the Committee continues to rely on the federal supply chain risk analysis conducted by PSPC in May 2021.

That 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.

Measures taken to remediate any forced labour or child labour

To date, the Committee has not been made aware of, nor does it possess, any information indicating that forced labour or child labour has occurred within its procurement activities or supply chain. As such, the Committee has not had to take any action to remedy such a situation.

The Committee remains committed to adopting best practices as it continues to develop the capacity to identify and respond to forced labour and child labour risks.

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

The Committee 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 supply chains, and therefore no remediation measures have been required or implemented.

Training provided to employees on forced labour and child labour

As a micro-organization with limited resources, the Committee continues to leverage awareness materials, guidance, and training resources developed by PSPC related to forced labour and child labour.

The Committee also ensures that all employees involved in procurement activities remain current with mandatory training requirements relevant to their functions.

In addition, the Committee promotes awareness of procurement-related obligations among procurement staff and remains engaged with federal partners as new guidance and training resources become available.

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

The Committee does not currently have standalone mechanisms in place to assess the effectiveness of measures specifically related to forced labour and child labour.

The Committee continues to rely on PSPC's Standing Offers and Supply Arrangements, which incorporate federal-level compliance and monitoring mechanisms, and regularly reviews policy guidance issued by PSPC to ensure ongoing alignment.

Recognizing the complexity of assessing the effectiveness of such measures, the Committee also remains engaged with the federal procurement community, including participating in knowledge-sharing activities and adopting best practices as they are communicated.

Approvals

This 2026 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* is approved by:

Miguel Adam, CPA

Director General, Corporate Services and Chief Financial Officer

Kelly Walsh

Chairperson and Chief Executive Officer