



**Federal Economic Development Agency for Southern Ontario**

**Report on Fighting Against Forced Labour and Child  
Labour in Supply Chains 2024–25**

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# Fighting Against Forced Labour and Child Labour in Supply Chains Act – Annual Report (April 1, 2024 to March 31, 2025)

## 1. Introduction

The *Fighting Against Forced Labour and Child Labour in Supply Chains Act* (Act) came into force on January 1, 2024. The purpose of this Act is to implement Canada's international commitment to contribute to the fight against forced labour and child labour through the imposition of reporting obligations on:

- government institutions producing, purchasing or distributing goods in Canada or elsewhere; and
- entities producing goods in Canada or elsewhere or in importing goods produced outside Canada.

The Act stipulates that any government institution producing, purchasing or distributing goods in Canada or elsewhere must, on or before May 31 of each year, submit a report to the Minister of Public Safety. The report must detail the steps the government institution has taken during its 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 Act's reporting obligations also apply to entities producing goods in Canada or elsewhere or importing goods produced outside Canada.

In keeping with the purpose of the Act, the Federal Economic Development Agency for Southern Ontario (FedDev Ontario or the Agency) has prepared the following report to fulfill this reporting requirement.

## 2. Report Contents

### 2.1 Information on FedDev Ontario's structure, activities and supply chains

FedDev Ontario works actively to advance and diversify the southern Ontario economy through funding opportunities and business services that support innovation and growth in Canada's most populous region. Agency employees work out of four office locations, including the headquarters in Waterloo, and regional offices in Toronto, Peterborough and Ottawa.

FedDev Ontario's mission is to build a strong southern Ontario economy that is resilient in times of crisis and catalyzes innovation, growth and economic development.

FedDev Ontario mainly purchases goods related to daily business activities, including office furniture and supplies, information technology equipment (computers, screens and accessories) and mobile phones.

## 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 procurement of goods by FedDev Ontario

FedDev Ontario has integrated Public Services and Procurement Canada's (PSPC) 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 its procurements, FedDev Ontario has used the following list of PSPC tools:

- Standing Offers
- Supply Arrangements
- Anti-forced labour contract clauses

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](http://canada.ca) website.

FedDev Ontario has used PSPC's awareness materials to guide its suppliers and safeguard its supply chains from forced labour and child labour. Furthermore, the Agency is referring its procurement personnel to these materials for awareness.

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

FedDev Ontario requires its vendors and their sub-contractors to meet the expectations and obligations set forth in PSPC's Code of Conduct for Procurement.

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.

Pursuant to the aforementioned amendments, FedDev Ontario has integrated the Code into its procurements, with a view to safeguarding federal procurement supply chains from forced labour and child labour. Contracts that the organization has awarded included the Code.

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 FedDev Ontario'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 that risk

FedDev Ontario requires its vendors and their sub-contractors to meet the expectations and obligations set forth in PSPC's Code of Conduct for Procurement.

As part of its commitment to the findings of PSPC's 2021 risk assessment, FedDev Ontario has incorporated key strategies into its internal processes. Under FedDev Ontario's Procurement Management Framework, all Project Authorities must attest to the ethical standards of companies they contract with. The measures provided by PSPC offer further assurances that contracts for goods and services uphold the highest standards related to forced labour regulations.

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

FedDev Ontario requires its vendors and their sub-contractors to meet the expectations and obligations set forth in PSPC's Code of Conduct for Procurement.

#### 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 FedDev Ontario's activities and supply chains

FedDev Ontario works closely with PSPC, who is the authority on matters pertaining to procurement, to leverage best practices and guidance to assist the Agency in developing 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.

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

FedDev Ontario is aware that PSPC has developed and is currently piloting a course for procurement officers and will leverage the course upon its publication for use across the Government of Canada. The Agency continues to actively monitor the development of awareness raising guidance materials and will aim to integrate these resources into its internal processes where feasible once they are made available.

Additionally, FedDev Ontario is consistently monitoring for additional training opportunities through the Canada School of Public Service (CSPS) and Public Services and Procurement Canada (PSPC).

## 2.8 Information on how FedDev Ontario assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains

FedDev Ontario assesses its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains by leveraging PSPC's best practices and guidance, including the updated anti-forced labour requirements in PSPC's policies and guidelines for procurement. In addition, FedDev Ontario continues to work closely with PSPC, who is the authority on matters pertaining to procurement.

Internally, FedDev Ontario conducts a quarterly analysis and review of procurement activities with its corporate governance committee. This review allows the Agency to assess the effectiveness of its controls related to forced labour and child labour.