



The National Battlefields  
Commission

Commission des champs  
de bataille nationaux

# *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

Annual Report 2023-2024

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# Context and purpose of the report

In 2018, Canada engaged with four other countries in the development of principles guiding government action to combat human trafficking in global supply chains. Building on this commitment, the [2019-2024 National Strategy to Combat Human Trafficking](#) framed federal activities through a whole-of-government approach outlining efforts to combat human trafficking. It is in the more recent context of the coming into force of the [Fighting Against Forced Labor and Child Labor in Supply Chains Act](#) (hereinafter “the Act”) adopted on January 1, 2024, that the National Battlefields Commission (NBC) must report on a first occasion, for the reporting period established from April 1, 2023 to March 31, 2024, on the measures and initiatives it has put in place to help protect human rights in federal contracts. In accordance with section 6 of the Act, the NBC intends to demonstrate annually the efforts it has made to prevent and eliminate the risks of forced labour or child labour in its procurement.

## Part 1: Identifying Information

**Name of government institution:** National Battlefields Commission (NBC)

**Financial reporting year:** April 1, 2023 to March 31, 2024

## Part 2 : Report contents

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

The NBC is Canadian Heritage organization with a mandate to preserve, conserve and develop the Battlefields Park, a unique heritage and dynamic space. The NBC offices are located in Quebec City.

In 2023-2024, the NBC operated with a budget of \$16 million (including provisions and amortization), excluding salary expenses. Of this amount, 14% represented the purchase of goods and 86% represented the purchase of services. In addition, 64% of this \$16 million budget was allocated to purchases made through Public Services and Procurement Canada (PSPC), which acts as central purchaser in accordance with ethical standards,

subjecting suppliers to a Code of Conduct and through Shared Services Canada (SSC), which specializes in the acquisition of hardware, software, telecommunications and telephony products and services. The other 36% was spent on goods and services from Canadian suppliers subject to Canadian labour rules and standards that prevent labour exploitation.

Less than 2% of the budget was allocated to purchases from industries considered more at risk, namely IT and textiles, for a total of \$311,000.

The NBC evolves in its achievements and interacts with many stakeholders from the private sector, public institutions and non-profit organizations. The values to which the NBC adheres in its 2022-2025 strategic plan include respect and goodwill, the environment, rigor and equity, in the name of which it would be incompatible to encourage forced labor and child labor, recognized as forms of modern slavery.

The NBC's activities were limited to the purchase of assets in Canada and abroad. The goods purchased were mainly:

- Technological;
- For printing;
- Artistic in nature;
- Textile products;
- Vehicles;
- Furniture.

## **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**

In the context of a recent entry into force of the *Act* (last quarter of fiscal year 2023-2024), information is not available for this reporting period given the absence of measures taken

to prevent and reduce the risk of forced labor or child labor being used at any stage of the production of goods produced, purchased or distributed.

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

In the context of the *Act's* recent coming into force, the NBC has not established an ongoing management process to identify, prevent, mitigate and report on how it deals with human rights impacts in its operations and supply chains.

### **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**

Although the NBC has not yet begun the process of determining which elements of its activities and supply chains involve a risk of forced or child labor, it has been made aware of the existence of different levels of risk depending on the sector of the goods purchased.

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

The NBC has not taken any measures to prevent or reduce the risk of forced or child labor in its operations 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**

The NBC has taken no action to address the loss of income for the most vulnerable families resulting from any measures taken to eliminate the use of forced or child labor in its operations and supply chains.

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

In 2023-2024, the NBC did not offer its employees any training on forced labor or child labor.

## 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

No policies or procedures were put in place in 2023-2024 to assess NBC's effectiveness in ensuring that forced labor and child labor are not used in its operations and supply chains.

## Conclusion

Aware of the efforts it will have to make to develop vigilance in its procurement processes to ensure that forced labor and child labor are not used, the NBC is encouraged by existing resources (frameworks, codes, guides, analysis, etc.) in the field. Moreover, the Policy on Ethical Procurement planned for 2024-2025 will be able to support institutions like the NBC and provide precise tools to frame their purchases. This report describes the very preliminary state of the data available to the NBC in this area due to the newness of the *Act*. The NBC plans to draw up an action plan to integrate risk assessment, preventive and corrective measures, etc. into its procurement practices, in line with the purpose of the *Act*.