For Children. For Change. For Life.



## **Report Summary**

An estimated 85 million of the world's children suffer in jobs that are dirty, dangerous and degrading. In addition, 21 million people worldwide are forced into labour, coerced, trapped, and intimidated to perform jobs which often have incredible risks attached. 5.5 million of these forced workers are children.

This report looks at Canada's connection to these issues by cross-referencing recent data on Canadian imports with the U.S. Department of Labor's <u>List of Goods Produced by Child Labor or Forced Labor</u>. It tracks the supply chains of large Canadian companies and industries to identify potential links to the "risky products" that may be reaching stores in Canada.

As part of our research, we asked several fundamental questions: What are Canadian companies doing to reduce the chances that children are toiling in fields, factories, and fishing boats to produce their goods? How do companies know their efforts to prevent child and forced labour are working? What happens when they uncover problems in their supply chains? And how are they sharing this information with consumers and investors?

As this report reveals, Canadian consumers may be unknowingly supporting child and forced labour through their everyday purchases. When consumers try to learn what, if anything, companies are doing to prevent exploitation, they are too often left in the dark. Even the most proactive shoppers are unable to make informed, ethical purchasing decisions because most companies fail to provide adequate information about what they are doing to keep their supply chains free of child or forced labour.

### **Disturbing Findings**

- More than half of companies assessed (52 per cent) did not provide any public reporting on their efforts to reduce the risk of child or forced labour in their supply chains.
- Mid-size and private companies are particularly lacking in reporting and transparency.
- Canada's food industry is the least transparent about their supply chains, even though child labour is most

prevalent in the agricultural sector. Sixty per cent of all child labourers toil in jobs like farming and fishing.

 A small group of companies leads the way towards comprehensive and transparent reporting: BlackBerry, Gildan Activewear, Hudson's Bay Company (HBC) and Mountain Equipment Co-op (MEC) place a high priority on keeping their supply chains free from child and forced labour—and are taking steps to publically prove it.

### Realistic Recommendations

Consumers, companies, and governments all have a part to play in eliminating child and forced labour:

- Canadian consumers are encouraged to learn to identify goods originating from risky areas and ask key questions of companies importing these goods into Canada.
- Canadian companies are urged to commit to measures such as: assessing supply chains for risky links; implementing strong policies and processes such as supplier codes of conduct; training staff and suppliers to monitor conditions and implement standards, including unannounced, third-party auditing; and introducing formal grievance mechanisms to report violations. They should also publicly report on these efforts.
- The Canadian government is called upon to create supply chain transparency legislation requiring companies to post comprehensive statements outlining steps taken to address child and forced labour in their supply chains, following jurisdictions such as the U.K. and California.





## 2 Introduction

The concepts of a child heading off to hard labour each day, or an adult being held against their will to work off a debt seem fictitious—like something out of a Dickens novel. In most people's minds, these practices were abolished hundreds of years ago.

But these problems are still very real. Children and adults alike are being exploited to make many of the products we purchase every day.

A 2015 Ipsos Reid poll conducted on behalf of World Vision found that

78% of Canadians are frustrated at how difficult it is to determine where, how, and by whom the products they buy are made.<sup>3</sup>

Increasingly, media and nongovernmental organizations (NGOs) are bringing attention to the links between these troubling labour practices and the goods we consume. In the six months leading up to the publication of this report, there have been news reports of children in the Democratic Republic of the Congo mining for metals which end up in our smartphones, child and forced labourers working in deplorable conditions in Thailand's multibillion-dollar seafood industry, and Syrian refugee kids being recruited as garment-factory workers producing clothes in Turkey for major apparel brands.

The International Labour Organization (ILO) estimates there are 168 million **child labourers** globally. More than half of them, 85 million in total, work at **jobs that are dirty, dangerous, and degrading**. These statistics do not count those with after-school jobs or who help with household chores. Instead, these children are robbed of their childhoods and put directly in harm's way.<sup>1</sup>

Additionally, there are 21 million victims of **forced labour**, including 5.5 million children, who are **coerced, trapped, and intimidated to work,** 

often in extremely dangerous conditions, with no ability to leave.<sup>2</sup>

Together, child and forced labour are among the most egregious labour practices. At the core, they are exploitative and seriously jeopardize people's well-being and waste their potential.

Canadians don't want to be part of the problem. Whether consumers or investors, they want to know the goods they buy or invest in haven't been produced by child or forced labour. Yet, currently, it is extremely difficult for most Canadians to know what, if anything, the companies who sell and produce those goods are doing to mitigate these risks in their supply chains.

In this report, we will refer to "risky goods." In doing this, we acknowledge that many companies import goods into Canada from countries with high rates of child and forced labour. The situation comes with three inherent "risks." Canadian companies are:

- Placing themselves at risk of contributing to the immense problems of child and forced labour
- 2 Placing consumers at risk of unknowingly supporting child and forced labour through their purchasing decisions
- 3 Placing child and forced labourers at risk by not investigating and controlling what's happening in their own corporate supply chains

This report highlights the extent to which companies importing goods into Canada are associated with the above risks. It provides a snapshot of some of the largest Canadian companies importing "risky goods" and the extent to which they are publicly communicating their policies and practices to address this issue.

Life in my village is still very difficult, but the work I do and what comes of it belongs to me now."

When Non was 17 years old and living in Laos, he decided he didn't want to be poor anymore. A recruiter promised him work across the border in a Thai garment factory. What he found instead was forced servitude aboard a fishing boat where he was regularly beaten and mistreated. After two years, Non was finally able to escape back to his village in Laos.

The incentive to be transparent with customers is powerful, given the clear desire of Canadians to know more about the labour practices that produce the products they buy. Any Canadian company that can show it is taking real, effective action to address the risk of child and forced labour will be in a better position to win the trust and loyalty of the public, and will be more attractive to investors.

Finally, we want to be clear that it is not the intent of this report to accuse any Canadian company of being intentionally complicit in child or forced labour. Indeed, we found no evidence of this.

The intent behind this investigation is to start a conversation between Canadians and the companies they purchase products from. Transparency of policy and proof of action will give Canadians the ability to shop with the confidence their actions are not leading to the exploitation and indignity of child labourers and those forced to work.

## 3 Methodology and Limitations

### **Items**

We began by selecting 50 common items on the U.S. Department of Labor's 2014 List of Goods Produced by Child Labor or Forced Labor, which lists more than 136 goods and the countries where they are produced. These 50 items were then cross-referenced against the Trade Data Online and Canadian Importers databases compiled by the federal Ministry of Innovation, Science and Economic Development (ISED).

In cases where goods identified on the List were too broad for an exhaustive analysis, representative items were selected. For example, where the U.S. Department of Labor's list broadly identifies "electronics" as a highrisk good, six popular subcategories—phones, computers, digital cameras, domestic appliances, headphones and speakers, and televisions—were selected as the focus.

We then identified the major importers of each item identified—those that collectively account for up to 80 per cent of all imports of a specific product-country combination. Where multiple subsidiaries or divisions of the same parent company were listed as separate importers, they were merged. For example, Shoppers Drug Mart was included under its parent company Loblaw.

Importer data was not available in all instances. In some cases, this was because there were no Canadian imports of a particular good from the country in question; in others, it was because importer information was withheld due to confidentiality rules. For this reason, the figures identified in this report should be considered conservative estimates.

### **Company Assessments**

Of the 1,264 companies identified in the importer research, 44 were selected for further assessment. We selected companies which:

- have their headquarters in Canada
- import either numerous risky goods or a single risky good core to their business
- have sizeable annual revenues

We assessed companies based on the extent to which they were **publicly reporting and demonstrating**, via websites or annual reports as of May 2016, their practices and policies to mitigate the risk of child and forced labour in their supply chains. As the assessments are based exclusively on information that has been made readily available to the public, **they may not** necessarily be reflective of the actual policies or practices of any given company.

Although the companies identified in this report import goods from countries in which there is significant risk of child and forced labour, it does not necessarily mean any of the goods these companies import have, in fact, been produced by child or forced labour.

| The 50 High-Risk Items We Investigated |             |          |            |              |  |  |  |  |  |
|--|-------------|----------|------------|--------------|--|--|--|--|--|
| Bananas                                | Corn        | Footwear | Onions     | Silver       |  |  |  |  |  |
| Beans (green)                          | Cotton      | Garlic   | Palm oil   | Soccer balls |  |  |  |  |  |
| Blueberries                            | Cucumbers   | Garments | Peppers    | Strawberries |  |  |  |  |  |
| Brazil nuts                            | Diamonds    | Gems     | Pineapples | Sugarcane    |  |  |  |  |  |
| Broccoli                               | Eggplants   | Gold     | Rice       | Tea          |  |  |  |  |  |
| Carpets                                | Electronics | Grapes   | Rubies     | Textiles     |  |  |  |  |  |
| Christmas decorations                  | Emeralds    | Jade     | Sapphires  | Tobacco      |  |  |  |  |  |
| Citrus fruits                          | Fireworks   | Leather  | Shellfish  | Tomatoes     |  |  |  |  |  |
| Cocoa                                  | Fish        | Melons   | Shrimp     | Toys         |  |  |  |  |  |
| Coffee                                 | Flowers     | Olives   | Silk       | Vanilla      |  |  |  |  |  |

### **Assessment Criteria**

The companies listed in this report were assessed against the following seven criteria.

The criteria cover a range of basic policies and duediligence mechanisms needed to effectively mitigate the risks of child and forced labour in supply chains, as well as best practices in public reporting for companies to demonstrate they are taking meaningful action.

Company websites and, where they exist, their most recent corporate responsibility reports were used as the basis for the assessments. Copies of assessments were shared with the companies in advance to provide them an opportunity to verify that no errors had been made.

#### **Public Commitment**

Does the company have a prominent, easily accessible statement indicating an organizational commitment to addressing child and forced labour?

### **Supplier Code of Conduct**

Is there a publicly available document outlining the company's standards and expectations of suppliers?

### **Training**

Is there a publicly available description of efforts undertaken to ensure staff and suppliers are aware of supply chain risks and company policies regarding child and forced labour? Has the company equipped staff and suppliers to effectively implement and monitor these standards?

### **Auditing**

Is there public evidence of an auditing process, ideally conducted by a third party, to measure compliance against supply chain standards?

#### **Audit Results**

Is there public disclosure of key audit metrics, such as the number of audits conducted, focus, aggregated results, and relevant findings?

### **Grievance & Remedy**

Is there public evidence of grievance mechanisms to report violations of standards and a process for responding to reported violations?

#### **Standalone Disclosure Statement**

Does the company have a comprehensive, standalone description of its efforts to address child and forced labour (including, for example, its assessment of supply chain risks, its policies and related due diligence processes, and progress and performance indicators related to child and forced labour)?



## **Key Findings**

After a thorough assessment of the broader import data plus the examination of the 44 focus companies, taking place from April to May 2016, several important findings stood out.

#### Canadians are at risk every day of unwittingly purchasing products made using child or forced labour.

Child and forced labour are not just international issues; they are Canadian issues. The total value of Canadian imports of the 50 items assessed was \$34.3 billion (CAD) in 2015. These are products that Canadians use and consume on a regular basis: from clothing to food to electronics.



**Canadian imports** of 50 common products at-risk of child and forced labour were worth Billion in 2015

This is roughly equivalent to the GDP of Newfoundland and Labrador

#### **Companies operating in Canada risk importing products** produced through child and forced labour.

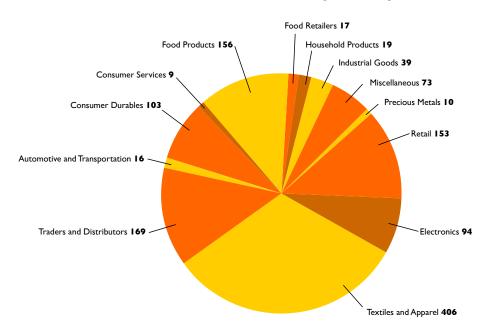
According to publicly available import data, the supply chains of at least 1,264 companies operating in Canada contain links to goods and countries with high incidences of child or forced labour. In reality, these numbers are likely significantly higher as our research only focused on 50 of the 136 items on the U.S. Department of Labor's List of Goods, and not all importer information was publicly available.

The companies that import potentially "risky goods" range from large multinational corporations to small- and medium-sized businesses. They operate in nearly every imaginable sector, from grocery and food production to retail and fashion. These companies have a tremendous amount of influence over how the goods they import are produced.

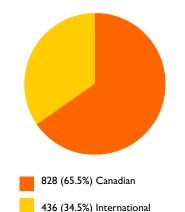
Two-thirds of companies (828 of the 1,264) we identified as having supply chains which may contain child or forced labour are Canadian-headquartered companies.

### **Characteristics Of Companies Assessed**

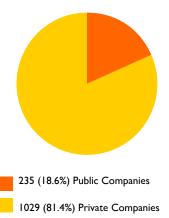
### Breakdown of the 1,264 companies by sector:



### Canadian-Headquartered vs International Companies



### **Public vs Privately Listed Companies**



### Most companies lack sufficient public reporting on the actions they are taking to address these risks

If the public reporting of the 44 companies assessed in this report are any indication, many Canadian companies seem ill prepared to address the possibility of child and forced labour in their supply chains. While a small handful of companies are leading the way with fulsome disclosures covering their policies and related due-diligence processes, many are completely silent, leaving consumers and investors in the dark about how (or even if) the company is taking steps to mitigate these risks.

Of the 44 Canadian companies whose public reporting was assessed, **23 (more than half) did not provide any information** about their efforts to keep child and forced labour out of their supply chains.



**52%** of companies

assessed did not provide any public information about their efforts to address child and forced labour.

Even amongst the remaining 21 companies that stated a commitment to avoid child and forced labour, many provided little or no evidence of key due-diligence practices to ensure these commitments are lived out.

### Companies with no public evidence of:

Training and support to suppliers: 33 companies (75%)

Supplier auditing: 24 companies (55%)

Grievance and remedy mechanisms: 31 companies (71%)

A very large gap exists between what these companies are currently disclosing about their efforts to address child and forced labour, and the amount of information that is truly needed to give consumers and investors confidence that sufficient action is being taken.

### A small number of Canadian companies are leading the way

A few prominent Canadian companies from different sectors are setting the standard for publicly reporting how they are preventing child and forced labour from entering their supply chains. BlackBerry, Gildan Activewear, Hudson's Bay Company (HBC), and Mountain Equipment Co-op (MEC) had the best assessments due to their comprehensive and transparent reporting practices.

These companies and their reporting practices serve as an example and resource to other Canadian companies that need to improve their policies and reporting around child and forced labour.

### Mid-size and private companies are particularly lacking in reporting and transparency

We found that mid-sized and privately owned companies disclose very little about how they address the risks of child and forced labour in their supply chains. These companies typically operate out of the public eye, and do not face the same pressures to inform their customers and investors how they are mitigating supply chain risks as larger attention-grabbing publicly-traded companies.

This is of concern because these companies are major importers of high-risk products. Much more needs to be done by these companies to disclose their supply chain policies and practices.

## The food sector is particularly behind the game when it comes to reporting

Canadians lack sufficient information about how their food gets to their tables. Of the companies and sectors assessed, Canadian food retailers, wholesalers, and producers were the underperformers in public reporting of best practices and policies to address the risks of having child or forced labour in their supply chains.

Within the food wholesaler and producer category, **only one of the 10 companies assessed disclosed any information about their efforts to address child- and forced-labour.** Within the food retailer category, only one company provided substantial reporting on this issue.

While a lack of public reporting may not indicate a lack of actual policies and practices, it would seem there is significant room for improvement amongst Canadian food companies to more fully address these issues.

## Sector Profile: Textile and Apparel

The anti-sweatshop campaigns of the 1990s focused public attention on the deplorable labour practices in the supply chains of multinational apparel companies. Despite this progress, child and forced labour continue to exist in the textile and apparel industry—from forced labourers harvesting cotton to children working in unauthorized subcontractor facilities.

The rise of fast fashion and the ensuing short production cycles put pressures on suppliers to deliver high volumes of goods in extremely limited time periods, at everreduced margins. This can cause suppliers to subcontract production to unauthorized facilities that "fly under the radar" and largely escape scrutiny, increasing the

possibility of child and forced labour. At the same time, it reduces the ability of the companies that place orders to effectively monitor and manage these risks.

In 2014, there were more than 406 companies importing textile and apparel goods into Canada, including retailers, manufacturers, and distributors. Of the 15 major Canadian textile and apparel companies importing "risky goods" assessed, 10 had an explicit or implied public statement prohibiting child and forced labour in their supply chains. While these efforts are laudable, only four of these companies disclose substantial evidence of robust processes to ensure adherence to these policies.

From 2011 to 2015, annual Canadian imports of goods at high risk of having child or forced labour in their supply chains have grown remarkably.



**Garment imports from high-risk countries** increased 30% from \$6.0 billion to \$7.7 billion.

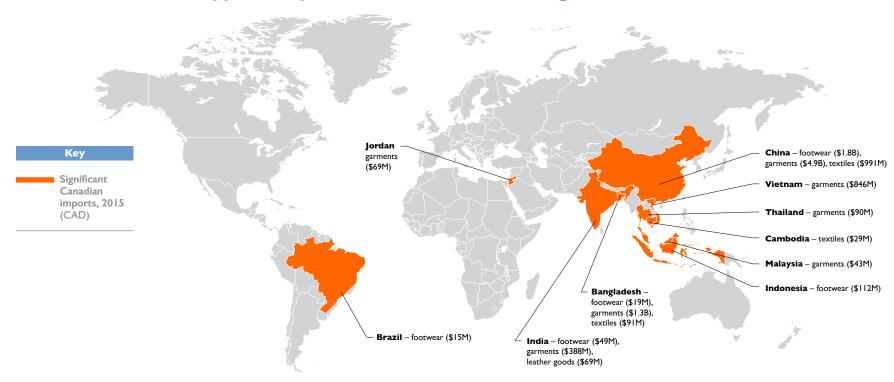


**Textile imports from high-risk countries** increased 39% from \$799 million to \$1.1 billion.



Footwear imports from high-risk countries increased 30% from \$1.6 billion to \$2 billion.

### Canadian textile and apparel imports from countries with high-rates of child and forced labour.



## Textile and Apparel



| Company   | Public<br>Commitment | Supplier Code<br>of Conduct | Training | Auditing | Audit Results | Grievance<br>& Remedy | Standalone<br>Disclosure |
|---|----------------------|-----------------------------|----------|----------|---------------|-----------------------|--------------------------|
| Aldo (Call it Spring, GLOBO)  |                      |                             |          |          |               |                       |                          |
| Aritzia   |                      |                             |          |          |               |                       |                          |
| Boutique La Vie En Rose (Bikini Village)  |                      |                             |          |          |               |                       |                          |
| Comark (Bootlegger, Cleo, Ricki's)  |                      |                             |          |          |               |                       |                          |
| Gildan Activewear   |                      |                             |          |          |               |                       |                          |
| Groupe Dynamite (Dynamite, Garage)  |                      |                             |          |          |               |                       |                          |
| Le Chateau  |                      |                             |          |          |               |                       |                          |
| Lululemon   |                      |                             |          |          |               |                       |                          |
| Nygard International (Alia, Nygård, Tan Jay)                                      |                      |                             |          |          |               |                       |                          |
| Peerless Clothing International   |                      |                             |          |          |               |                       |                          |
| Reitmans (Addition-Elle, R.W. & Company, Penningtons, Smart Set, Thyme Maternity) |                      |                             |          |          |               |                       |                          |
| Roots Canada  |                      |                             |          |          |               |                       |                          |
| Stormtech Performance Apparel   |                      |                             |          |          |               |                       |                          |
| Town Shoes (The Shoe Company, Shoe Warehouse)                                     |                      |                             |          |          |               |                       |                          |
| YM Inc. (Bluenotes, Sirens, Stitches, Suzy, Urban Planet, West 49)                |                      |                             |          |          |               |                       |                          |



A major manufacturer of branded clothing, including t-shirts, sport shirts, underwear and socks, Gildan utilizes a "vertically integrated" manufacturing model. Due to this direct ownership of the majority of its production processes, the company has a high degree of oversight and control over its supply chain.

Gildan maintains a dedicated sustainability website where it outlines its social-compliance efforts, including those related to child and forced labour. In addition to stating its policies, the company proactively discloses key elements of its due-diligence process: training provided to its employees and suppliers, audit methodology and results, and remediation plans.

HOME



























## Sector Profile: General Retailers

In addition to apparel and electronics, potentially "risky goods" being imported by Canadian retailers include toys, linens, carpets, and Christmas decorations. Instances of both child and forced labour for such goods have been well documented by the media and NGOs in recent years. In one factory that made toys for a major brand, workers as young as 14 were documented to be to be labouring in harsh conditions.

While retailers are often one or more degrees removed from the actual manufacturing process, these retailers, especially the larger companies, can have a

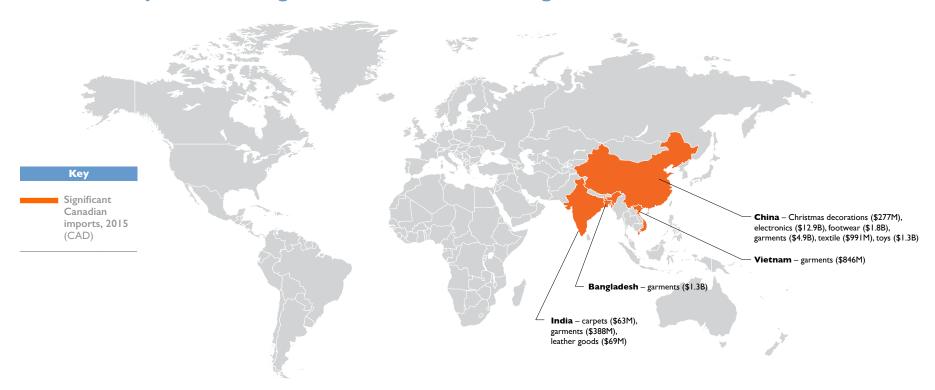
significant amount of influence on these supply chains by leveraging their purchasing volume. What's more, many large retailers sell private-label goods and, in these cases, they have a degree of direct control over the conditions under which these goods are produced.

In 2014, there were more than 153 retail companies importing "risky goods" into Canada. Of the nine major Canadian companies assessed, three did not disclose any information regarding their efforts to address child and forced labour in their supply chains.



Between 2011-2015, annual **Canadian imports of toys from** China increased by 36 per cent, from \$973 million to \$1.3 billion

### Canadian imports of retail goods from countries with high-rates of child and forced labour.



## **General Retailers**



| Company   | Public<br>Commitment | Supplier Code of Conduct | Training | Auditing | Audit Results | Grievance<br>& Remedy | Standalone<br>Disclosure |
|---|----------------------|--------------------------|----------|----------|---------------|-----------------------|--------------------------|
| Canadian Tire (Mark's Work Warehouse, PartSource, Sport Chek)               |                      |                          |          |          |               |                       |                          |
| Dollarama   |                      |                          |          |          |               |                       |                          |
| Giant Tiger   |                      |                          |          |          |               |                       |                          |
| Holt Renfrew  |                      |                          |          |          |               |                       |                          |
| Hudson's Bay Company (Home Outfitters,<br>Lord & Taylor, Saks Fifth Avenue) |                      |                          |          |          |               |                       |                          |
| Indigo Books and Music (Indigo, Chapters, Coles)                            |                      |                          |          |          |               |                       |                          |
| Mountain Equipment Co-op (MEC)  |                      |                          |          |          |               |                       |                          |
| The North West Company (Northern, NorthMart)                                |                      |                          |          |          |               |                       |                          |
| Simons  |                      |                          |          |          |               |                       |                          |



**Best Practice Case Study** 

Hudson's Bay Company

Mountain Equipment Co-op In addition to strong supply chain reporting generally, two Canadian companies—HBC and MEC—disclose the names and locations of their direct suppliers on their websites.

By making this information public, these companies have demonstrated a willingness to be open to a high level of scrutiny. This increased transparency enables Canadian and local civil-society organizations to monitor and verify compliance with international labour standards, and provides a basis for dialogue to address challenges.





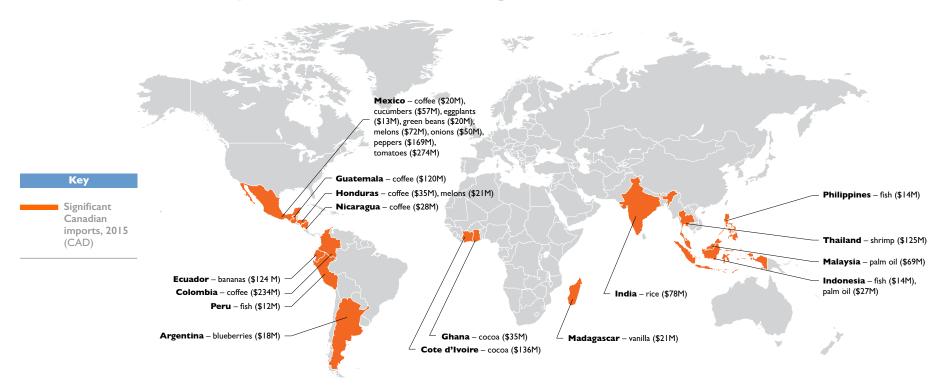
## **Sector Profile: Food**

Amongst the sectors examined in this report, public reporting on policies and practices to address child and forced labour is least advanced among Canada's food companies. This is disheartening in light of the fact that 60 per cent of all child labourers are found in the global agriculture sector, which includes farming, fishing, aguaculture, forestry, and livestock. <sup>4</sup>These jobs are amongst the most dangerous when it comes to accidents, occupational diseases, and fatalities.

The supply chains of foods that many Canadians consume on a regular basis—including coffee, chocolate, vegetables, and seafood—have endemic challenges with child and forced labour. Because many of these commodities originate from multiple sources, tracing their origins is a challenging task.

More than 173 companies imported potentially risky food items into Canada in 2014. These included food retailers, fresh-produce wholesalers, and producers. Food retailers, given their more public face, fared slightly better within this sector. However, the vast majority of food companies had no public reporting on their efforts to address child and forced labour.

### Canadian food imports from countries with high-rates of child and forced labour.

























## **Food Retailers**



13/19

| Company  | Public<br>Commitment | Supplier Code<br>of Conduct | Training | Auditing | Audit Results | Grievance<br>& Remedy | Standalone<br>Disclosure |
|--|----------------------|-----------------------------|----------|----------|---------------|-----------------------|--------------------------|
| Bulk Barn  |                      |                             |          |          |               |                       |                          |
| Loblaw Companies Ltd. (Fortinos, Loblaws,<br>No Frills, Real Canadian Superstore,<br>Shoppers Drug Mart, et al.) |                      |                             |          |          |               |                       |                          |
| Metro Inc. (Super C, Food Basics, Metro, et al.)   |                      |                             |          |          |               |                       |                          |
| Overwaitea Food Group (Overwaitea Foods, Save-on-Foods, et al.)  |                      |                             |          |          |               |                       |                          |
| Sobeys (Foodland, FreshCo, Price Chopper, Safeway, et al.)   |                      |                             |          |          |               |                       |                          |



Auditing is an important tool companies can use to verify adherence to policies and standards laid out in supplier codes of conduct. The auditing process should include both scheduled and non-scheduled visits to production sites, reviews of relevant documentation, and interviews with workers.

Independent third-party audits can ensure those carrying out the audit have the objectivity needed to ask the right questions of the right people.

By publicly disclosing the high-level results of their audits—including the number and percentage of suppliers audited over the past year, a summary of key findings, and information on any corrective action taken—companies can further reassure and demonstrate to consumers and investors that they take their commitments seriously.

# Food Producers and Wholesalers



| Company   | Public<br>Commitment | Supplier Code<br>of Conduct | Training | Auditing | Audit Results | Grievance<br>& Remedy | Standalone<br>Disclosure |
|---|----------------------|-----------------------------|----------|----------|---------------|-----------------------|--------------------------|
| Courchesne Larose   |                      |                             |          |          |               |                       |                          |
| Export Packers Company Ltd. (Chef's Jewel, Family Delight, Ocean Jewel) |                      |                             |          |          |               |                       |                          |
| Fresh Direct Produce  |                      |                             |          |          |               |                       |                          |
| Gambles Ontario Produce   |                      |                             |          |          |               |                       |                          |
| Lakeside Produce  |                      |                             |          |          |               |                       |                          |
| Mother Parker's Tea & Coffee  |                      |                             |          |          |               |                       |                          |
| Nutriart (Laura Secord)   |                      |                             |          |          |               |                       |                          |
| Soline International (Anchor's Bay, Natural Mer)                        |                      |                             |          |          |               |                       |                          |
| Sun Rich Fresh Produce  |                      |                             |          |          |               |                       |                          |
| Tai Foong International (Jasmine Delight,<br>Northern Kind, Thai Gold)  |                      |                             |          |          |               |                       |                          |

## **Sector Profile: Electronics**

Electronic products such as tablets, smartphones, cameras, televisions, and appliances are the result of a process involving long, complex supply chains. From the mining of precious metals to the manufacture of electrical components to the assembly of finished products, each stage has been shown to be highly susceptible to labour abuses, including child and forced labour.

In places like the Democratic Republic of the Congo, children as young as seven have been found to be mining in hazardous conditions for coltan, a key component in electronic devices. Further up the supply chain, in Malaysia and China, undocumented foreign labourers are forced to work off impossible levels of debt and recruitment fees at the hands of deceptive labour brokers.

In 2015, more than \$13 billion worth of potentially risky electronic goods, with origins in countries known for child and forced labour, were imported into Canada.

Only five Canadian electronic companies - including retailers, manufacturers, and distributors - were assessed to provide a snapshot of reporting practices. Few Canadian companies are involved in directly manufacturing the goods assessed, and the relatively small purchase volumes of retailers and manufacturers limit the degree of control over social and environmental standards in these supply chains.

### Canadian imports of electronics from countries with high-rates of child and forced labour.



## **Electronics**



| Company              | Public<br>Commitment | Supplier Code<br>of Conduct | Training | Auditing | Audit Results | Grievance<br>& Remedy | Standalone<br>Disclosure |
|----------------------|----------------------|-----------------------------|----------|----------|---------------|-----------------------|--------------------------|
| BlackBerry           |                      |                             |          |          |               |                       |                          |
| Curtis International |                      |                             |          |          |               |                       |                          |
| Erikson Pro Audio    |                      |                             |          |          |               |                       |                          |
| Sierra WIreless      |                      |                             |          |          |               |                       |                          |
| Tiger Direct         |                      |                             |          |          |               |                       |                          |



Canadian companies' relative size and influence in the electronics sector is limited. Industry initiatives such as the Electronic Industry Citizenship Coalition (EICC) allow companies to coordinate efforts and leverage their collective influence to ensure ethical supply chains. Such initiatives promote the use of standardized codes of conduct and collectively recognized auditing. Joining and publicly disclosing membership in such initiatives is one way Canadian companies can demonstrate their commitment to high supply chain standards, including those related to child and forced labour. BlackBerry and Sierra Wireless are EICC members.

## Conclusions and Solutions

Unfortunately, child and forced labour are still part of the global supply chains that create the goods we all buy. While there are no simple solutions, Canadian companies, consumers, and government can play a role in addressing these problems.

### Recommendations for Canadian Consumers

There are a number of steps that concerned consumers can take.

- Learn about what goods might be at risk by checking out the U.S. Department of Labor's List of Goods Produced by Child Labor or Forced Labor
- Ask companies what they are doing to address the risk of child and forced labour in their supply chains, and request that this information be made readily available. Ask the right questions using this card.
- **Encourage transparency and greater action** by engaging in productive dialogue with companies rather than accusing or boycotting them.
- Make informed purchasing decisions. Buy from those companies that have demonstrated a commitment to addressing child and forced labour.
- **Sign the petition** asking the Canadian government to create legislation requiring large companies to publicly report on their efforts to monitor, address, and prevent child and forced labour in their supply chains.

### Recommendations for **Canadian Companies**

Importing goods from countries with known child- and forced-labour risks does not mean that a company or its suppliers has done anything wrong. It does, however, mean that appropriate steps should be taken by companies to assess and mitigate these risks and proactively disclose these efforts.

We encourage all companies to take the following steps.

- Make a commitment to address child and forced labour.
- Assess where your supply chains are at risk.
- Implement strong policies and due diligence processes to ensure they are lived out, including:
  - a. Supplier codes of conduct prohibiting child and forced labour
  - b. Staff and supplier training to raise awareness and build capacity to monitor and implement these standards
  - c. Unannounced, third-party supplier auditing to measure compliance
  - d. Formal, accessible grievance mechanisms to report violations of standards and a process for responding to reported violations
- Clearly and publicly disclose the steps you are taking to address the risks of child and forced labour in your supply chains, providing consumers and investors with meaningful, comprehensive information.
- **Engage in dialogue** on these issues with consumers, NGOs, investors, and other companies.

























## Conclusions and Solutions CONTINUED

## Recommendations for the Canadian Government

Governments in other jurisdictions have created laws requiring companies to post comprehensive statements outlining the steps they have taken to address child and forced labour in their supply chains. They do this to provide consumers and investors with the information they want, and to encourage greater company action.

Create federal supply chain transparency legislation that would require companies operating in Canada to publicly report on what they are doing to address child and forced labour in their supply chains on an annual basis.

87% of Canadians

think the federal government should require Canadian companies to publicly report on who makes their products and what they are doing to reduce child labour in their supply chains<sup>3</sup>



Best Practice Highlight

Supply Chain Transparency Legislation The U.K.'s Modern Slavery Act (2015) requires companies doing business in the U.K. with annual revenues over £36 million to produce an annual statement outlining the steps, if any, they are taking to address child and forced labour in any of their supply chains. California has had similar legislation for a number of years, and other jurisdictions are considering similar requirements.

Supply chain disclosure statements such as those required in the U.K. and California provide consumers and investors with the information they need. It allows them to assess a company's efforts to address the possibility of child and forced labour in their supply chains and take appropriate action.

By harnessing consumer, investor, and competitive pressure, these "light-touch" laws also create positive incentives for companies to proactively deal with these issues, without being overly prescriptive or burdensome.

























## **Appendix**

### **Further Reading**

If you would like to learn more about the issues raised in this report, we recommend the following resources.

#### World Vision Canada's No Child for Sale campaign

- 10 Steps Companies Can Take
- Conscious Consumer Challenge
- Check the Chain Report

#### U.S. Department of Labor

List of Goods Produced by Child Labor or Forced Labor

#### **Product-specific Information**

- Tea: Labour exploitation in the global tea industry
- Coffee: Labour exploitation in the global coffee industry
- Palm oil: Forced, child and trafficked labour in the palm oil industry
- Cotton: Forced and child labour in the cotton industry
- **Technology:** Forced and child labour in the technology industry
- Seafood: Trafficking and labour exploitation in the global fishing industry
- **Jewelry:** Forced and child labour in the jewellery industry

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