

2024  
2025

# REPORT ON FORCED LABOUR IN CANADIAN SUPPLY CHAINS



**WDBA**  **APWD**  
Windsor-Detroit Bridge Authority    Autorité du pont Windsor-Détoit

**Canada** 



## Windsor-Detroit Bridge Authority - 2025 Annual Report under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act*

### SUBMISSION INFORMATION

Government institution's name: **Windsor-Detroit Bridge Authority**

Financial reporting year: **April 1, 2024 - March 31, 2025**

Reporting period: **2025 reporting period (May 31, 2025 deadline)**

This is a report produced by a federal Crown corporation. WDBA has its principal office located in Ontario, Canada.

WDBA is responsible for the delivery of the Gordie Howe International Bridge between Windsor, Ontario and Detroit, Michigan, through a public-private partnership (P3). It is also responsible for project oversight of the construction and the operation of the new crossing. As the operator of the new bridge, WDBA will set and collect all tolls.

### Structure, activities and supply chains

Indicate which of the following describes your government institution's structure:

- **parent Crown corporation**

Describe how your government institution engages in the following activities\*:

- **Purchasing goods**
  - **in Canada**
  - **outside Canada**

At Windsor-Detroit Bridge Authority, approximately 50% (representing \$82,109.55) of the annual value of our purchases were made through the use of Shared Services Canada (SSC) tools such as Standing Offers and Supply Arrangements.

Since November 2021, SSC has implemented anti-forced labour clauses in all goods contracts to ensure that it 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. Furthermore, as of November 20, 2023, all SSC Standing Offers and Supply Arrangements that have been



issued, amended, or refreshed include anti-forced labour clauses as part of the general conditions for goods.

As such, all of our contracts for goods resulting from the use of SSC's tools include PSPC's clauses relating to forced labour, which outline, among other things, human rights and labour rights requirements.

Additionally, during this reporting period we purchased goods under our own procurement authority in the following instances: purchases of office supplies, computer hardware and software, communication and audio-visual equipment, and commercially available products for its office and employee requirements.

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

Describe the steps your government institution has taken in 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.

- Conducting an internal assessment of risks of forced labour and/or child labour in the organization's activities and supply chains
- Developing and implementing anti-forced labour and/or -child labour contractual clauses
- Developing and implementing anti-forced labour and/or -child labour standards, codes of conduct and/or compliance checklists
- Monitoring suppliers
- Engaging with supply chain partners on the issue of addressing forced labour and/or child labour

To prevent and reduce the risk of forced labour or child labour in our procurements, WDBA has used the following list of PSPC's and SSC's tools to which the Code of Conduct for Procurement applies:

- Standing Offers
- Supply Arrangements

WDBA also undertakes activities under its own procurement authority, independently of the aforementioned SSC tools. During the previous fiscal year, we purchased goods under our own procurement authority in the areas described in the previous question.



## Policies and due diligence processes in relation to forced labour and child labour

**Indicate whether your government institution has policies and/or due diligence processes in place related to forced labour and/or child labour and, if applicable, describe these policies and/or processes.**

In its RFX documents, WDBA requires its prospective suppliers to provide a description or strategy outlining the following, which is included as a weighted component of the evaluation criteria: ensuring that all sourced goods and services adhere to ethical standards, including fair trade practices, labour rights protections, and responsible sourcing of materials. The strategy must demonstrate compliance with applicable laws and ethical labour practices, which may include implementing due diligence measures to prevent, identify, and eliminate any risks of forced labour and child labour in their operations and supply chains.

WDBA also requires proponents to provide a comprehensive ESG strategy, and describing their commitment to adopting and promoting, among others, health and safety, labor, environmental, and ethical principles.

Once awarded a contract, suppliers are required to observe Standards of Conduct, including abiding by applicable employment standards, labour, non-discrimination and human rights legislation. Suppliers must ensure that, in their workplaces, employment standards meet or exceed legal and regulatory requirements and forced/compulsory labour and child labour are not used.

## Identifying parts of your 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

**Indicate in your report whether your government institution has identified the parts of its activities and supply chains that carry a risk of forced labour or child labour being used.**

WDBA's internal assessment indicates that it has no activities or supply chains that carry forced labour and child labour risks. In procuring goods, WDBA also partners with other Government of Canada agencies when applicable, e.g.,. SSC/GC Surplus.



**SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.**

**Indicate the aspects of your activities and/or supply chains that have been identified as carrying forced labour or child labour risks.**

- The sector or industry it operates in
- The types of products it produces, sells, distributes or imports
- The locations of its activities, operations or factories
- The types of products it sources
- The raw materials or commodities used in its supply chains
- Tier one (direct) suppliers
- Tier two suppliers
- Tier three suppliers
- Suppliers further down the supply chain than tier three
- The use of outsourced, contracted or subcontracted labour
- The use of migrant labour
- The use of forced labour
- The use of child labour
- **None of the above**
- Other, please specify

**Indicate whether your government institution identified forced labour or child labour risks in its activities and supply chains related to any of the following sectors and industries:**

- Agriculture, forestry, fishing and hunting
- Mining, quarrying, and oil and gas extraction
- Utilities
- Construction
- Manufacturing
- Wholesale trade
- Retail trade
- Transportation and warehousing
- Information and cultural industries
- Finance and insurance
- Real estate and rental and leasing
- Professional, scientific and technical services
- Management of companies and enterprises
- Administrative and support, waste management and remediation services
- Educational services
- Health care and social assistance
- Arts, entertainment and recreation



- Accommodation and food services
- Other services (except public administration)
- Public administration
- **None of the above**
- Other, please specify

## Measures taken to remediate any forced labour or child labour

Indicate whether your government institution has taken any measures to remediate any forced labour or child labour in its activities and supply chains.

- **We have not identified any forced labour or child labour in our activities and supply chains.**

If you have taken remediation measures, describe them. **Not applicable**

## 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

Indicate in your report whether your government institution has taken any measures to remediate the loss of income to the most vulnerable families that results from any measure taken to eliminate the use of forced or child labour in its activities and supply chains.

- **We have not identified any loss of income to vulnerable families resulting from measures taken to eliminate the use of forced labour or child labour in our activities and/or supply chains. As such, no measures have been taken to remediate the loss of income for the most vulnerable families.**

If applicable, describe any measures the government institution has 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 its activities and supply chains.

- **Not applicable**



## Training provided to employees on forced labour and child labour

Indicate whether your government institution currently provides training to employees on forced labour and/or child labour.

- Yes, the training is mandatory for all employees.

WDBA has developed a training material to ensure employees understand the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* and its requirements. The training is schedule to be delivered in May 2025.

WDBA is also aware that SSC is committed to ongoing risk identification, promotion and development of mitigation practices, and ongoing activities to raise awareness within its procurement community and engage with industry and strategic partners.

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

Indicate whether your government institution currently has policies and procedures in place to assess its effectiveness in ensuring that forced labour and child labour are not being used in its activities and supply chains. If applicable, describe the methods used by your government institution to assess its effectiveness.

- Setting up a regular review or audit of the organization's policies and procedures related to forced labour and child labour

WDBA requires its suppliers, as part of the technical evaluation criteria and the final agreement, to observe Standards of Conduct which includes the requirement that forced/compulsory labour and child labour are not used. WDBA suppliers have the responsibility to report to WDBA any known or suspected violations of any applicable laws and/or any non-compliance with the Standards of Conduct in a timely manner.

Additionally, WDBA is in the process of reviewing its Procurement Policy and Procedures to ensure that forced labour and child labour are not being used in its activities and supply chains.