

August 20, 2026

Dear International and Intergovernmental Labour Affairs/Labour Program, Employment and Social Development Canada,

I am writing to you today on behalf of the 43 members of the Canadian Network for Corporate Accountability. Our members are subject-matter experts on business and human rights and collectively represent millions of Canadians standing in solidarity with workers and communities harmed by the operations and supply chains of Canadian companies and companies importing goods into Canada.

We welcome the opportunity to provide inputs to the government's public consultation on potential due diligence and civil liability measures to fight labour exploitation in supply chains. Our detailed submission and membership list are attached to this letter. Below is a summary of key points:

1. The evidence is crystal-clear: Mandatory due diligence is necessary to address labour rights abuses in Canadian supply chains.

If Canada is serious about addressing labour exploitation in supply chains, it must absolutely enact a robust, mandatory due diligence regime. Such a regime reinforces the implementation of Canada's forced labour import ban, helps impacted workers access remedy, and plays an important role in preventing unintended harmful consequences associated with import bans globally. Canada's current forced labour reporting regime [has not been effective](#) – as we [repeatedly cautioned](#).

2. An effective due diligence law must require companies to meaningfully engage rights-holders, prevent harm, and remedy harm that occurs. It must establish civil liability for companies linked to human rights abuse and must have a scope which encompasses, at a minimum, all fundamental labour rights.

These essential criteria would ensure that Canada's legislation is aligned with international best-practices to effectively meet the needs of impacted rights-holders. Civil liability is an essential enforcement and remedy mechanism, helping impacted-people access justice in Canadian courts and incentivizing companies to develop robust practices to prevent human rights abuse.

3. Canada must make a clear and time-bound commitment to table comprehensive mHREDD legislation, applying to all human rights including the right to a healthy environment.

An effective labour rights due diligence law is an important first step to move Canada beyond voluntary and reporting-only approaches to corporate accountability, but it cannot be the only action the government takes. Directly-impacted communities and international human rights observers have sounded the alarm for decades at widespread human rights violations linked to the activities of Canadian companies around the world. A limited labour rights due diligence approach fails to respond to many of these needs and does not meet Canada's international human rights obligations. It also impedes Canada's ability to seriously address labour exploitation, which is often connected to the abuse of other human rights (for instance, gendered or racial discrimination). As a growing number of jurisdictions around the world adopt comprehensive mHREDD legislation, including the jurisdictions named in the consultation document, Canada remains behind its global counterparts and risks maintaining an uneven playing field if it does not commit to promptly building on its proposed labour rights due diligence law. **CNCA has developed model legislation, endorsed by over 200 organizations [in Canada](#) and [around the world](#), which the government can adopt at any time.**

Thank you for your time and consideration. We remain available for any further consultation or information required.

Sincerely,

Aidan Gilchrist-Blackwood

Aidan Gilchrist-Blackwood, Network Coordinator
On behalf of the Canadian Network for Corporate Accountability