

2023 Report on Forced Labour and Child Labour in Halifax Water's Supply Chains

Introduction

This report was prepared and submitted by Halifax Regional Water Commission ("Halifax Water") for the 2023/2024 fiscal year. It outlines Halifax Water's activities, supply chains, and an assessment of the risk of forced labour or child labour in its procurement processes.

This is the first report prepared by Halifax Water under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* ("Act").

Structure, Activities and Supply Chains

Structure

Halifax Water is a municipal water, wastewater, and stormwater utility. It is a corporation¹ wholly owned by Halifax Regional Municipality.² Halifax Water only operates within the Province of Nova Scotia, and has no employees based outside of Canada. It is governed by a board of directors, pursuant to the *Halifax Regional Water Commission Act*.³

Halifax Water is filing this report as an "entity" as it satisfies all three conditions under section 2(b) of the *Act*. Halifax Water has approximately 620 employees and exceeds both remaining conditions in 2(b) for (i) having over \$20 million in assets and (ii) generating over \$40 million in revenue. As such, this report is subject to the reporting requirements of section 11 in the *Act*.

Activities

Halifax Water's purpose is to supply and safeguard sustainable, high-quality water services to more than 106,000 customers and an estimated 412,000 people. Halifax Water is responsible for protecting source waters and the supply and distribution of potable water. It also operates and maintains wastewater and stormwater collection systems and treatment plants. In the provision of water services, Halifax Water has business units that promote environmental stewardship, regulatory compliance, asset management, safety and security, fiscal responsibility, and customer service.

¹ Section 3(2), [Halifax Regional Water Commission Act](#)

² Section 6, [Halifax Regional Water Commission Act](#)

³ Section 4, [Halifax Regional Water Commission Act](#)

Supply Chains

Halifax Water purchases goods and services to support its day-to-day operations. It does not own or operate any facilities that manufacture, grow, extract or process goods.

The majority of Halifax Water’s purchases are from Canadian suppliers and contractors. The table below outlines the number of suppliers from outside of Canada that Halifax Water purchased goods from in 2023.

Country	Number of Suppliers
United States	62
United Kingdom	1
Sweden	1
Denmark	1

None of the countries listed above appear on the United States Department of Labour 2022 List of Goods Produced by Child Labour or Forced Labour.⁴ In addition, the Walk Free Human Rights Group indicates that the most at-risk goods imported into Canada (electronics, garments, gold, textiles, and sugarcane) do not come from any of the countries where Halifax Water purchases goods.⁵

Policies and Due Diligence Processes in Relation to Forced Labour and Child Labour

Policies

Halifax Water has an extensive list of policies that cover all areas of its operations. In particular, Halifax Water has policies that promote both responsible business practices, and respect, honesty and integrity in the workplace.

The Halifax Water Code of Conduct applies to all employees and sets minimum expectations for appropriate workplace behaviour. This policy must be acknowledged by signing upon hire and requires employees to uphold and respect the law and not knowingly engage in illegal activities.

Collective Agreements

The majority of Halifax Water’s workforce is covered by two collective agreements. These agreements help ensure that no forced labour or child labour are imposed within the workplace by providing unionized employees with labour and bargaining rights and protections. The remaining, non-union workforce is protected by Nova Scotia Labour Standards legislation.

⁴ Table 1, [2https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf](https://www.dol.gov/sites/dolgov/files/ILAB/child_labor_reports/tda2021/2022-TVPR-List-of-Goods-v3.pdf)

⁵ Table 18, <https://www.walkfree.org/global-slavery-index/methodology/methodology-content/#prevalence>

Procurement

Procurement activities at Halifax Water are governed by an internal Procurement Policy (“Policy”) which is publicly available on Halifax Water’s website.⁶ Halifax Water is also expected to conduct procurement activities in keeping with the Nova Scotia *Public Procurement Act* and *Municipal Government Act*.

The Policy promotes social, environmental and financial sustainability in planning and purchasing. It also acknowledges Halifax Water’s responsibility to support enterprises with core objectives that advance equity, diversity, inclusivity, socio-economic interests and building healthy communities. The Policy indicates that Halifax Water is not obligated to determine best value solely on price. Rather, Halifax Water can consider the social and environmental responsibility, among other qualitative factors of prospective suppliers, in the selection process.

Measures Taken to Remediate Any Forced Labour or Child Labour

Since both the supplier countries and types of goods imported by Halifax Water carry a low risk of forced labour and child labour, no measures have been taken to remediate under section 11(3)(d) of the *Act*.

Measures Taken to Remediate the Loss of Income to the Most Vulnerable Families

Halifax Water has not identified any instances of forced labour or child labour, therefore section 11(3)(e) of the *Act* is not applicable.

Training Provided to Employees on Forced Labour and Child Labour

Halifax Water does not provide specific training on awareness and prevention of forced labour and child labour in supply chains at this time.

Assessing the Effectiveness of Ensuring Forced Labour and Child Labour Are Not Being Used


Halifax Water does not currently have a method to assess the effectiveness of efforts to ensure forced labour and child labour are not being used in the production or supply of imported goods to support its operations.

⁶ <https://halifaxwater.ca/procurement-tender-opportunities>

Report Approval and Attestation

In accordance with the requirements of the *Act*, and in particular section 11(4)(a) thereof, I attest that I have reviewed the information contained in this report for Halifax Water. Based on my knowledge, and having exercised reasonable diligence, I attest that the information in this report is true, accurate and complete in all material respects for the purposes of the *Act*, for the reporting year 2023.

Full Name: Kenda MacKenzie
Title: Acting General Manager
Date: May 31, 2024

Signature: 

I have the authority to bind Halifax Water.