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Forced Labour / International Security and Political Affairs Branch
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Subject: Electro Federation Canada Submission on the Regulatory Approach under Bill C-35

On behalf of Electro-Federation Canada (EFC), we are writing to share member feedback regarding the proposed regulatory approach under Bill C-35.

Electro-Federation Canada (EFC) represents more than 230 member companies that manufacture, distribute, market, sell, and maintain a range of electrical and automation products. EFC member products and technologies include distribution equipment, transformers, switchgears, electric vehicle (EV) chargers, lighting, motors & generators, cables & wires, wiring supplies, industrial controls, enclosures, automation software, and more. Members create and support $15.1 billion in GDP impact across Canada and sustain more than 109,000 jobs, helping advance the country's energy transition and electrified future.

The electrical and automation industry is a foundational enabler of the federal government's economic, energy, and industrial objectives. Achieving Canada's long-term goals, including the need to significantly expand electricity infrastructure to support electrification, economic growth, housing development, data centres, and industrial investment, will depend on reliable access to the equipment, technologies, and components that power the grid. The sector supplies the critical infrastructure necessary for grid modernization and expansion, while also supporting efforts to strengthen domestic manufacturing capacity, attract private investment, enhance energy security, and build more resilient North American supply chains. Canada's electrical manufacturing sector is also a key contributor to economic growth, jobs, and competitiveness, with opportunities to expand domestic production in strategic areas while remaining deeply integrated with global and North American supply chains.

Given the industry's central role in delivering these national priorities, any new forced labour regulatory framework should be carefully designed to achieve its policy objectives while remaining practical, risk-based, and administratively efficient for industry. Compliance requirements should minimize unnecessary costs, duplication, and supply chain disruptions, particularly for sectors like the electrical and automation industry that rely on complex and highly integrated international supply chains for critical infrastructure inputs. This is especially important at a time when manufacturers and suppliers are already facing significant uncertainty, rising costs, and procurement challenges driven by tariffs, trade disputes, material shortages, and broader global supply chain pressures.

Against this backdrop, EFC's recommendations are intended to support a framework that effectively addresses forced labour while providing industry with clear, proportionate, and workable compliance requirements.

EFC views Bill C-35 as a positive step toward addressing unfair trade in Canada. EFC recommends that the process for identifying and listing high-risk goods be transparent, evidence-based, and regularly updated in consultation with industry. High-risk designations should consider country- and sector-specific risks and the realities of multi-tiered supply chains. Where practical, Canada should align with standards and lists used by the U.S. and EU to ensure consistency and reduce trade disruptions and duplicative compliance requirements.

Many EFC members have already mapped and assessed their supply chains under Bill S-211. The government should use S-211 reports and existing industry practices as a foundation for practical and proportionate initial requirements under Bill C-35, with deeper requirements phased in following a review of initial performance and consultation with industry.

EFC supports supply chain tracing requirements for high-risk goods where the information is feasible to collect and proportionate to the risk. For complex products containing many components and suppliers, a risk-based approach focused on the most vulnerable tiers and regions would be more manageable than blanket requirements. Government should provide clear guidance on the format, scope, and acceptable sources of tracing information, including commonly used evidence such as commercial invoices, supplier attestations, and mill certificates.

EFC also recommends streamlining reporting requirements. Members already face interrelated obligations under USMCA/NAFTA, conflict minerals requirements, and Bill S-211. Where possible, these should be combined into a standardized approach to responsible business reporting.

EFC recommends resources for expedited review of critical infrastructure components, including components from the electrical and automation industry, as well as clear procedures for challenging detentions. Detention of imported goods for up to 90 days could adversely affect project timelines, manufacturing capacity, and introduce higher costs for industrial facilities. Clear obligations, as well as streamlined and transparent compliance processes with customs officers, can help ensure that goods entering the country do not contain forced labour in their supply chains while also minimizing compliance costs for industry.

EFC appreciates the opportunity to provide feedback on this consultation. We encourage the Government of Canada to continue engaging with industry as these measures are developed to ensure the final framework is effective, practical, and responsive to the realities of complex global supply chains.

Thank you for considering the perspectives of EFC and our members. We would welcome the opportunity to participate in any further input as the regulatory framework is developed and implemented.

Sincerely,

Cherith Sinasac
Director of Government Affairs
Electro-Federation Canada