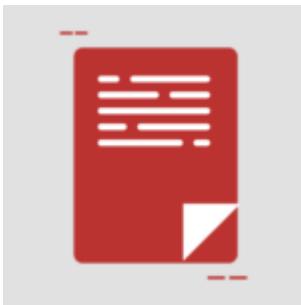


# Bill C-251 And Modern Slavery



[Bill C-251](#) (*An Act to amend the Customs Act and the Customs Tariff*) was introduced in October 2025. If enacted, it would establish a statutory presumption that goods originating from designated countries are made in whole or in part by forced or child labour and are therefore prohibited from importation into Canada.

The Bill would also impose due diligence obligations on importers, who would be required to demonstrate to the Canada Border Services Agency (“CBSA”) that they have performed effective due diligence on their supply chain. Given the potential impact of this Bill, all importers should closely monitor developments as the bill moves through Parliament.

## **The Country-Based Presumption Against Forced-Labour Imports**

Bill C-251 was introduced with the goal of expanding the federal government’s authority to restrict imports that may be linked to forced labour and child labour.

The proposed mechanism under Bill C-251 would allow the Governor in Council, on the recommendation of the Minister of Public Safety and Emergency Preparedness, to designate specific countries where there are reasonable grounds to believe that goods are made, in whole or in part, using forced or child labour.

Goods originating from those designated countries would be presumptively prohibited from importation into Canada unless importers successfully rebut the presumption by demonstrating

to the CBSA that they have effective supply chain controls in place and have carried out the required due diligence.

### **Rebutting the Presumption: Evidence Requirements**

Under Bill C-251, the presumption that goods are made using forced or child labour may be rebutted only if all of the following conditions are met:

- 1. Supply Chain Monitoring and Management Measures:** The importer demonstrates to a customs officer that they have performed the prescribed supply chain monitoring and taken the prescribed supply management measures;
- 2. Documentation and Evidence:** The importer provides the officer with any prescribed certification or information;
- 3. Exercise of Due Diligence:** The importer demonstrates to the officer that they have exercised all due diligence, as prescribed, to ensure the goods are not goods mined, manufactured or produced in whole or in part by forced labour or child labour; and
- 4. CBSA Satisfaction Regarding Tariff Classification:** The officer is satisfied that the goods are not goods of tariff item No. 9897.000.00 under the description of goods mined, manufactured or produced wholly or in part by forced labour or child labour.

Bill C-251 leaves the detailed requirements to be defined through future regulations.

**New Canadian rules bar imports from designated countries on presumption of forced or child labour.**

**Experienced Counsel can help rebut that presumption and obtain clearance for goods not produced through forced labour.**

## **Takeaways**

While Bill C-251 remains at first reading in Parliament and no countries have been designated, it would have a significant impact on importers by imposing a due diligence obligation on forced-labour imports. Importers should closely monitor legislative developments and consider how their supply chains align with potential requirements.

Authors: [Robert Kreklewetz](#), [Daniel Zhang](#)

Millar Kreklewetz LLP