

Canada's forced labour regulatory timeline

Key Canadian and U.S. developments shaping supply chain due diligence and enforcement, 2026–2027

Last updated: July 24, 2026

This timeline is provided for general informational purposes and does not constitute legal advice.

March 2026

March 12, 2026 (United States)

USTR Section 301 investigation initiated

The Office of the U.S. Trade Representative initiated a Section 301 investigation into the forced labour enforcement frameworks of 60 countries, including Canada.

June 2026

June 2, 2026 (United States)

USTR investigation findings published

The USTR found that Canada is not effectively enforcing its forced labour import prohibitions and proposed 10% tariffs on Canadian imports.

June 3, 2026 (United States)

Executive Order 14411 issued

"Strengthening Customs Enforcement" sets 90- and 180-day deadlines for new legislation on importer eligibility and reporting requirements.

June 12, 2026 (Canada)

Bill C-35, first reading

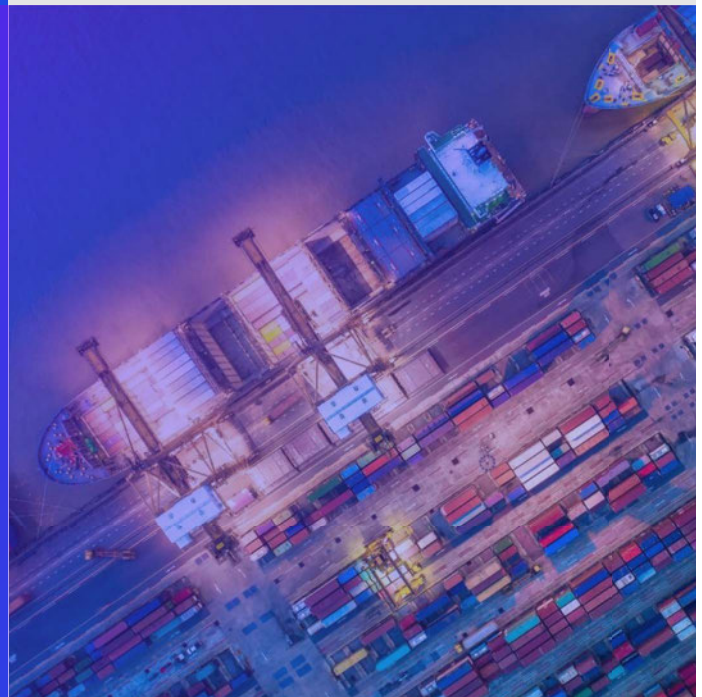
Introduced in direct response to the USTR findings, Bill C-35 would create a standalone forced labour import prohibition regime, separate from the existing *Supply Chains Act*.

May 2026

May 31, 2026 (Canada)

Modern Slavery Report due

Annual reporting deadline under the *Fighting Against Forced Labour and Child Labour in Supply Chains Act* for in-scope Canadian companies.





July 1, 2026 (Canada, United States, Mexico)

CUSMA joint review held

Canada, the United States and Mexico held the first mandatory six-year joint review of CUSMA. The agreement was not renewed for a further 16-year term at that time, but remains in force and may still be renewed in the future.

July 7-9, 2026 (United States)

USTR public hearings held

USTR held public hearings on the proposed Section 301 measures following its forced labour investigations into 60 economies, including Canada.

July 23, 2026 (United States)

USTR final action announced

Following the Section 301 investigations and public hearings, USTR announced final action imposing additional duties on 60 economies. Canada was included among the economies subject to a 10% tariff. USTR identified USMCA/CUSMA-qualifying goods from Canada and Mexico as exempt from the measures.

Dates marked TBD reflect anticipated timing based on the legislative process and public statements as of the publication date; timing may change.

August 2026 (expected)

[TBD] August 2026 (Canada)

High-risk goods list to be released

A list of high-risk goods and enhanced import requirements is expected to be published, with timing potentially affected by legislative progress.

September 2026 (expected)

[TBD] September 1, 2026 (United States)

EO 14411, 90-day deadline

The first tranche of Executive Order measures is expected to come into force.

[TBD] September 2026 (Canada)

Public Safety Canada Reporting Framework

A framework is expected to be applied to evaluate the quality and maturity of modern slavery reports, including benchmarking over time and across reporting entities.

Fall 2026 (expected)

[TBD] Fall 2026 (Canada)

Bill C-35 progresses through Parliament

Bill C-35 received First Reading before Parliament recessed for the summer. Further consideration is expected when Parliament resumes in the fall. Based on the current parliamentary calendar, passage could occur as early as September or October, although timing remains uncertain and the legislative process could be expedited.

December 2026 (expected)

[TBD] December 1, 2026 (United States)

EO 14411, 180-Day deadline

The final tranche of Executive Order measures is expected to come into force.

November 2026 (expected)

[TBD] November 3, 2026 (United States)

U.S. Midterm Elections

The outcome could affect Congressional authority over tariffs going forward.

2027 and beyond (expected)

[TBD] 2027 and beyond (Canada)

Due diligence regulations

Canada may introduce stricter supply chain due diligence requirements and reporting criteria beyond current disclosure obligations.

Contact us

Questions about Canada's evolving forced labour and supply chain requirements? Contact our team.



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