



July 21, 2026

Canadian Chamber of Commerce
275, Slater Street
Ottawa, Ontario K1P 5H9

Re: Canadian Chamber of Commerce Request for Feedback on Bill C-35 (Forced Labour Laws) in Response to USTR's Section 301 Forced Labour Investigations

The proposed Bill C-35 legislation would impact the building materials industry in Canada. Many building materials in Canada are locally sourced, however, some products such as plastic components, hardware, some steel, and some cabinets and flooring are imported from overseas.

Within our industry there is strong self-enforcement to ensure that imported goods come from reputable sources that produce quality goods using ethical labour practices. In short, our members know where their imported products are coming from, and abide by existing forced labour laws. Furthermore, in the building materials industry, the onus is on businesses to ensure imported goods are not produced with forced labour. Our members have explained to Supply-Build Canada that they provide the Government of Canada with signed documentation stating that the imported product abides by Canada's forced labour laws.

Some provisions in the legislation have created additional uncertainty for the building materials industry which comes with questions and concerns outlined below:

1. Not knowing the minister's list creates uncertainty for the industry. What goods will be added, and what process will take place for goods to be added?
2. Without an appeal process will industry be consulted before a good is placed on the list? A review through federal court would be costly and time consuming.
3. The new 90-day detention period of a building material, or a component used in a building material could result in delays further down the supply-chain as materials delayed for 90 days before reaching a manufacturing facility, or a distribution centre will delay the shipment of a good to a construction site. Since Canada's construction season is limited to 8 months per year this delay could prolong home developments and infrastructure projects into the following building season.
4. The possibility of additional documentation. As mentioned above the building supply industry is already required to provide documentation stating that imported goods are not made with



Supply-Build Canada

Formerly the Western Retail Lumber Association

102-226 Osborne St. N.
Winnipeg, MB R3C 1V4
TF: (800) 661-0253
www.supplybuild.ca



forced labour. Depending on the required depth of the traceability of the imported good additional documentation requires could add time and costs onto business operations.

Supply-Build Canada's members understand that to avoid 301 tariffs, the Government of Canada must demonstrate that they are enforcing forced labour laws. Our industry takes forced labour laws seriously and welcomes additional efforts made by government.

Thank you.



Your partner in business. Leading a stronger building materials industry.