

Permanent Mission of Canada
to the United Nations
and the World Trade Organization



Mission permanente du Canada
auprès des Nations Unies
et de l'Organisation mondiale du commerce

GENEV- 10310

The Permanent Mission of Canada to the United Nations and the World Trade Organization at Geneva presents its compliments to the Office of the High Commissioner for Human Rights, and has the honour to refer to the Joint Communication AL CAN 6/2025, dated 01 December 2025.

In this regard, the Permanent Mission of Canada has the honour to submit Canada's response.

The submission consists of one document.

The Permanent Mission of Canada to the United Nations and the World Trade Organization at Geneva avails itself of the opportunity to renew to the Office of the High Commissioner for Human Rights the assurances of its highest consideration.



Geneva, 02 February 2026.

Canada



Responses by Canada to the Joint Communication from Special Procedures

AL CAN 6/2025

Introduction

1. Please provide any additional information and/or comments you may have on the above-mentioned allegations.

The Government of Canada takes Special Procedures communications very seriously.

The High Commission of Canada in Pakistan is in regular communication with representatives of the Reko Diq gold and copper mine, as well as with Barrick Mining Corporation representatives involved in the Reko Diq initiative. During these discussions, issues raised include Reko Diq's approach to responsible business practices, corporate social responsibility and social investments in support of the local communities within the mining concession or adjacent thereto. In November 2025, Canada's High Commissioner and trade officials visited the Reko Diq mine site. Canadian officials also engage with representatives of the Pakistan federal government and the Balochistan provincial government on the matter of the Reko Diq mine and more widely on the mining sector.

Following the receipt of the Joint Communication on December 1, 2025, Canadian officials have raised the allegations referenced in the Joint Communications from the Special Procedures with Barrick Mining Corporation representatives and have underlined our government's expectations for responsible business conduct (RBC) by Canadian companies operating abroad, emphasizing alignment with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises.

The Government of Canada expects Canadian companies active abroad, including in Pakistan, to abide by all relevant laws, to respect human rights, to operate transparently in consultation with host governments and local communities, and to work in a socially and environmentally responsible manner consistent with internationally respected guidelines on RBC. This includes the UN Guiding Principles, the OECD Guidelines for Multinational Enterprises, the Voluntary Principles on Security and Human Rights, and sector-specific standards as relevant.



2. Please indicate what steps your Government has taken or is considering to take to uphold its duty to protect against human rights abuses by the Reko Diq project, ensuring that business enterprises domiciled in its territory and/or jurisdiction conduct human rights due diligence to identify, prevent, mitigate, and account for how they address their impacts on human rights throughout their operations (including abroad), as set forth by international law and standards, including the UN Guiding Principles on Business and Human Rights (UNGPs).

The Government of Canada does not recognize extraterritorial obligations in the human rights treaties to which it is party. That being said, we expect all Canadian companies operating in Canada and abroad, including in Pakistan and regardless of sector, to respect human rights, all applicable laws and international standards, to operate transparently and in consultation with host governments and local communities, and to work in a socially and environmentally responsible manner, in accordance with internationally recognized guidance. This expectation also applies to Canadian companies sourcing their goods and services abroad.

Canada's approach to RBC includes preventative measures, legislation in select areas, and access to non-judicial dispute-resolution mechanisms: the National Contact Point (NCP) and the Canadian Ombudsperson on Responsible Enterprise (CORE).

Through Canada's Trade Commissioner Service network of more than 1,000 Trade Commissioners at offices in Canada and at diplomatic and consular missions around the world, including in Pakistan, Canadian officials actively promote RBC best practices and provide practical guidance on implementing RBC policies and conducting human rights and environmental due diligence to Canadian companies active abroad. Global Affairs Canada provides RBC training to its Trade Commissioners on how to support Canadian companies to conduct business in a socially and environmentally responsible manner, consistent with internationally recognized standards and practices.

Canada has a broad domestic regulatory regime that complements its advocacy and promotion efforts abroad. For example:

- Canada has made it a criminal offense to offer a bribe to a foreign public official under the Corruption of Foreign Public Officials Act.

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- Under the Extractive Sector Transparency Measures Act, Canada requires extractive companies listed in Canada to declare all taxes paid and where they are paid.
- In July 2020, amendments to the Customs Tariff made it illegal to import products manufactured wholly, or in part, through forced labour.
- Under the Fighting Against Forced Labour and Child Labour in Supply Chains Act, in force as of January 2024, supply chain transparency requirements are imposed on certain entities and government institutions to report on measures taken to prevent and reduce the risk that forced labour or child labour is used in their supply chains.
- Canada is a board member of the Voluntary Principles on Security and Human Rights Initiative and the International Code of Conduct Association -- global multistakeholder initiatives working to protect human rights and uphold humanitarian law in the extractives and security sectors.

Canada also has two voluntary, non-judicial dispute resolution mechanisms to address alleged human rights impacts linked to the activities of Canadian companies, consistent with the UN Guiding Principles and the OECD Guidelines for Multinational Enterprises on RBC (OECD Guidelines).

Canada's NCP for RBC was established in 2000 as part of Canada's commitment to support the implementation of the OECD Guidelines. The NCP can help parties resolve disputes regarding implementation of the Guidelines, which cover a range of issues including human rights, the environment, and employment and industrial relations.

The CORE was established in 2019 to strengthen Canada's longstanding and extensive engagement in RBC and reinforce its commitment to human rights and inclusive trade. As a complement to the NCP, the CORE focuses on allegations of human rights abuses committed abroad in the garment, mining, and oil and gas sectors.

Companies that fail to engage in good faith with either dispute resolution mechanism may face the denial of trade advocacy support from the Government of Canada, potential exclusion from Canadian government-backed financing, and scrutiny under Export Development Canada support policies. While the frequency of such cases in practice is not publicly reported, Canada's dispute resolution mechanisms do not preclude pursuing recourse in other fora such as courts in host countries or in Canada, as appropriate.

Canada



- 3. Please describe the guidance, if any, that your Government has provided to the Barrick Gold Corporation on how to respect human rights throughout its operations in line with international law and standards, including international environmental law and the UN Guiding Principles. Measures to be implemented include, inter alia, guaranteeing effective access to information, public participation and access to justice, conducting human rights due diligence, consulting meaningfully potentially affected stakeholders, and remediating any negative impacts.**

See response to question 2.

Government of Canada officials, including ministers, maintain ongoing contact with the company in question, both in Canada and abroad. These meetings provide an opportunity to hear about the company's operations, to share concerns raised by different stakeholders and to convey information about the Government of Canada's expectations and guidance regarding RBC as it relates to its mining operations in Balochistan and around the world.

The Government of Canada expects and encourages Canadian companies – including their subsidiaries – to conduct their activities in accordance with internationally recognized standards of RBC, including the UNGPs, the OECD Guidelines and the Voluntary Principles (VPs) on Security and Human Rights.

Canada supports access to remedy through non-judicial mechanisms, including the CORE and the NCP, which examine allegations, facilitate dialogue, and issue recommendations to promote alignment with international standards. Access to certain Government of Canada trade advocacy services may be withdrawn or refused if Canadian companies do not participate in good faith in these mechanisms.

Canada continues to consider ways to strengthen its RBC framework in line with evolving international best practices.

- 4. Please kindly provide information on how your Government ensures that business enterprises under its jurisdiction, including private military and security companies, do not impact negatively the ability of human rights defenders to conduct their legitimate work, specifically in light of the recommendations provided to States in the report of the Working Group on the issue of human rights and transnational corporations and other business**



enterprises on the adverse impact of business activities on human rights defenders (A/HRC/47/39/Add.2).

Canada is a board member of the VPs on Security and Human Rights Initiative (VPI), which provides guidance to anticipate and mitigate human rights risks associated with public and private security, particularly in the extractive sector. The VPs guidance is part of the RBC standards promoted through Canada's Trade Commissioner Service. Trade Commissioners receive training on RBC and the VPs before postings, enabling them to both advocate for and to support Canadian companies in implementing RBC best practices, including the VPs, which the Mining Association of Canada (MAC) members have also committed to implementing. Barrick is a member of both the VPI and MAC, reflecting its commitment to be aligned with these RBC standards.

The Government of Canada, through its NCP for the OECD Guidelines for Multinational Enterprises, promotes respect for the rights of human rights defenders in the context of business activity and provides a non-judicial mechanism to address concerns where business conduct may negatively affect their ability to carry out legitimate activities. The NCP operates in accordance with the OECD Guidelines, which call on enterprises to respect human rights, avoid causing or contributing to adverse impacts, and engage meaningfully with stakeholders, including human rights defenders.

- 5. Please indicate what measures your Government has taken, or is considering taking, to support victims of business-related human rights abuses and human rights defenders who have been affected by the operations of business enterprises domiciled in Canada and ensure that they have access to an effective remedy through judicial or non-judicial State-based mechanisms, in line with the UNGPs. If no such action has been taken, please explain why.**

See response to question 2.

The Government of Canada provides two non-judicial dispute-resolution mechanisms:

- Canada's NCP for RBC and;
- CORE.

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Both mechanisms underpin Canada's RBC system by offering non-judicial avenues for addressing human rights impacts and promoting responsible business practices internationally.

Canada's Trade Commissioner Service (TCS) takes allegations of client misconduct seriously. When allegations arise, the TCS may meet with the client to reinforce Canada's RBC expectations and provide advice. Consequences may include the withdrawal of future trade support from the TCS and recommending that Export Development Canada and the Canadian Commercial Corporation withdraw future support to the client. By influencing corporate behavior in international trade, these measures not only impose real consequences but also create conditions for sustained improvements in RBC. These measures incentivize compliance and foster sustainable improvements in RBC.

Canada supports the VPI as a platform for multi-stakeholder dialogue, mutual learning, relationship-building, and collaborative problem-solving to address security and human rights challenges in countries and pertaining to extractive operations. Since 2019, Canada has supported in-market initiatives through a dedicated Responsible Business Fund. This fund allows Canadian missions abroad through Canada's Trade Commissioner Service to facilitate workshops, seminars, roundtables, and information product dissemination to promote international guidelines and best practices, including the VPI.