



April 7th 2015

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Consultation on Canada Gazette Part 1 Notice - 14 March 2015
Strengthening Canadian Citizenship Act

The Canadian Association of Professional Immigration Consultants (CAPIC) is the official voice of the immigration consulting profession, and represents over 1000 members across Canada and around the world. In turn our members represent many thousands of CIC clients each year and are very familiar with the delivery of the Citizenship programs.

We thank you for this opportunity to provide stakeholder input as part of the consultation process. CAPIC has solicited input from our membership and have summarized the feedback below.

The Gazette notice focuses on several elements from the Strengthening Canadian Citizenship Act for which new regulations will be drafted and published in Part II of the Gazette in the future.

The areas outlined include expanding current language evidence requirements to those 14 years of age and older, a strict physical presence test of 1460 days over a 6 year period, introduction of tax year residency and tax filing requirements, and new provision to fast track certain members of the Canadian Armed Forces. There are also provisions regarding revocation of citizenship.

Our members recognize the importance and the value of Canadian Citizenship and we received positive feedback on the Act's recognition of this value in the residence requirements. Those that become Canadian are embracing this nation and should have a track record of physical residence to corroborate that.

The concept of Lost Canadians continues to be addressed as provisions for those adopted by Canadians prior to the original Citizenship Act of 1947 are addressed. We are happy to see that CIC continues to address these regulatory gaps as they are discovered in the interest of fairness to those who have often thought of themselves as Canadian Citizens for many decades.



The most interesting element to our members is the proposed naming of the Immigration Consultants of Canada Regulatory (ICCRC) as the designated body for Citizenship applications. By naming ICCRC as the body responsible for regulating those that can represent, advise (or offer to represent or advise) for consideration, CIC is strengthening the protection of consumers by introducing true accountability into these citizenship matters for the first time.

We also feel that this a strong endorsement of the ICCRC's work on its current mandate under IRPA. Our members are ICCRC members as well, and CAPIC continues its support of, and collaboration with, the ICCRC to enhance the skills of our members and show the high level of professionalism that our members bring to the Canadian immigration system.

Our members are excited that their membership in ICCRC will clarify with certainty their ability to practice in this area in the future, and will provide much greater clarity in the marketplace for our membership. CAPIC looks forward to addressing this change through increased education programs offered for members on Citizenship matters in the future. CAPIC is strongly in favour of ICCRC being designated under this Act.

Some members are definitely concerned with the new provisions for revocation of citizenship for certain security related crimes, in the context of dual citizen Canadians and those singularly Canadian. It's important to see the distinction that this creates between two classes of Canadian citizens, and also that due to citizenship and nationality laws in sovereign nations, many of those born in Canada may not even be aware of other citizenship status that they inherited.

There is some concern on the evidence that 14-17 years old minors will be able to provide for their knowledge of English or French. They won't be able to provide educational documents to prove official language study; these individuals will be too young to have completed secondary school - completion of a program, rather than completion of a course or a year of a program is the current requirement for adult applicants. There may also be stress on minors having to write a high stakes language exam that was designed for adults. In fact some IELTS testing centres clearly indicate that the test is not recommend for those under age 16.

We recommend that a full consideration of what is age appropriate for minors be undertaken before any requirements of official language proof be implemented for this age group.



Again, CAPIC thanks you for this opportunity to contribute and have its members' opinions considered on this important matter.

Yours truly,

A handwritten signature in black ink that reads "D. Jade". The signature is written in a cursive, flowing style.

Dory Jade, RCIC, C. Dir.
President