![CAPIC ACCP logo] Canadian Association of Professional Immigration Consultants
L'Association Canadienne des Conseillers Professionnels en Immigration

September 21, 2021

The Honourable Sean Fraser, P.C., M.P.
Minister of Immigration, Refugees and Citizenship
Government of Canada
Minister@cic.gc.ca

Re: Request to Delay Moving to 100 Percent Online Applications

Dear Minister Fraser:

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), we are writing to request delaying the implementation of 100 percent online applications for most permanent resident programs.

CAPIC (www.capic.ca) represents more than 4100 authorized immigration and citizenship consultants (RCICs). While we appreciate the need to modernize and make the best use of resources to streamline immigration processing, member feedback reflects the instability of the portals.

Many practitioners report ongoing portal issues both in the authorized rep portal and other portals for specific immigration programs. Some portals, such as the permanent residence application portal, are working well, and practitioners are appreciative of the efficiency. However, there are constant and general ongoing issues across the system, including:
- the system is down regularly and unable to access.
- users inexplicably locked out and then unable to log in.
- incomprehensible gateway errors.
- disappearing applications.
- unresponsive web form.
- long delays in reply to technical issues.
- lack of slots to upload documents containing new information.

The above are just but a few of the issues heard from CAPIC members. Although, practitioners have a toolbox of methods to solve these problems, including using multiple browsers, logging in/logging out, and troubleshooting in general, hours are lost in trying to navigate the issues that, usually, are glitches within the IRCC technical

system itself. Deadlines can be missed while grappling with these issues and the impact can be catastrophic to the end users.
CAPIC has been glad to contribute to the consultation process and participate in demos and testing, yet there remain significant technical issues. It seems unlikely that the current system and framework can ably support a smooth transition to a 100 percent online system. Extensive delays may occur, adding on to already lengthy processing times.

CAPIC urges the Minister and the Department to delay implementation of the 100 % transition online to allow continued testing and programming. By doing so, users of the system, both represented by practitioners or self-represented, can experience and appreciate a more seamless transition. CAPIC is happy to assist in this on a consultative basis by providing ongoing feedback and support.

Thank you for your attention to this matter.

Yours Truly,

Dory Jade, C. Dir.
Chief Executive Officer
CAPIC-ACCPI