



Employment and Social Development Canada
Email: NC-CNP-NOC-GD@hrsdc-rhdcc.gc.ca

June 5, 2024

Re: Recommend revising the main duties and employment requirements of NOC 41403 concerning immigration and citizenship consultants

Dear Sir/Madam,

The Canadian Association of Professional Immigration Consultants (CAPIC) would like to bring to your attention the following issues concerning [NOC 41403](#) in NOC 2021. The issues are about some descriptions concerning the profession of immigration and citizenship consultants, namely, Regulated Canadian Immigration Consultants (RCICs) and Registered International Students Immigration Advisors (RISIAs).

First, the term “the Immigration Consultants of Canada Regulatory Council,” also commonly known as ICCRC, in the employment requirements section is outdated. On December 9, 2020, with the coming into force of the *College of Immigration and Citizenship Consultants Act*, S.C. 2019, c. 29, s. 292 (the [College Act](#)), the College of Immigration and Citizenship Consultants ([CICC](#)), the regulatory body for RCICs and RISIAs established by the College Act, replaced the ICCRC. The use of ICCRC, which no longer exists after the completion of its transition to CICC, may cause confusion. Therefore, we recommend replacing it with CICC.

Second, the licensees of the CICC include RCICs and RISIAs. While RCICs’ duties match the description of the main duties in NOC 41403, RISIAs’ do not. According to the CICC, [RISIAs](#) are employees of Canadian education organizations; their practice is restricted to study permits and related matters, and they are not authorized to represent clients in immigration or citizenship matters, including filling out immigration forms for clients. For NOC 41403 to accurately reflect the main duties of both RCICs and RISIAs, which are quite different, we recommend listing RCICs and RISIAs separately.

Third, for individuals to present themselves as immigration and citizenship consultants, either being an RCIC or a RISIA, they must be a licensee of CICC according to s 77 of the College Act. Therefore, to accurately reflect the requirements of the law, we recommend using “immigration and citizenship consultants” to replace “regulated Canadian immigration consultants” in the last line of the employment requirements section.

Being the sole association recognized by the Government of Canada as the [voice](#) of RCICs, CAPIC is committed to promoting the ethics and competence of our members and protecting



the [integrity](#) of the RCIC profession and the Canadian immigration system. If CAPIC may further assist with the Department, we will be glad to collaborate with you and your team.

Yours Truly,

A handwritten signature in black ink that reads 'D Jade'.

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

c John Murray
President & CEO, Registrar, CICC

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