

Premier Doug Ford  
Ontario Premier  
Office of the Premier  
Email to: [premier@ontario.ca](mailto:premier@ontario.ca)

November 29, 2024

**Re: Respectfully requesting not to use derogatory language for immigration consultants concerning cracking down on immigration scams**

Dear Premier Ford,

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), we would like to bring to your attention that you may have unintentionally used “scumbag immigration consultants” in a recent [tweet](#) when sharing the news of the Ontario government’s initiative to crack down on immigration scams.

The objective of the legislation was described as “to crack down on fraudulent immigration representatives who exploit newcomers” in the news release, “[Ontario Cracking Down on Immigration Scams](#),” by the Ontario Government led by you on November 20, 2024. According to [ss.91](#)(1) and (2) of the *Immigration and Refugee Protection Act*, SC 2001, c. 27 (IRPA), immigration representatives can be non-authorized and authorized. The former cannot charge for their services. The latter consists of three types of representatives who are authorized by s. 91(2) of IRPA to provide charged immigration services and advice. They are members of a Canadian law society, members of *Chambre des notaires du Québec*, and members of the *College of Immigration and Citizenship Consultant (CICC)*. In the Quick Facts section of the above-mentioned news release explains two types of authorized immigration representatives: immigration consultants and Canadian lawyers. Therefore, it is clear that the legislation is to prevent immigration fraud.

We believe you are aware that “Immigration and citizenship consultant” and its variations, including “immigration consultants,” are exclusively reserved for licensees of the CICC as per [ss. 2](#) and [77\(a\)](#) of the *College of Immigration and Citizenship Act*, SC 2019, c. 29, s. 292 (the *College Act*). The “scumbag immigration consultants” in your tweet caused confusion among the media outlets and some picked “immigration

consultants” up and used similar terms like bad-actor immigration consultants in their news reports. While CAPIC acknowledges the existence of bad actors in any profession, including the profession of immigration consultants, we would like to point out that the majority of immigration consultants are ethical, competent, hard-working professionals. The Standing Committee on Citizenship and Immigration ([CIMM](#)) recognized that “the vast majority of immigration consultants operate within the high standards of the profession.”

Unauthorized practitioners (UAPs) are the ones who consistently pounce holes in the Canadian immigration system. To defraud people with immigration needs, they often disregard Canadian laws and present themselves as “immigration consultants” or even “[lawyers](#).” Your comment and the spread of the news carrying false information not only damage the reputation of the immigration consultant profession but also confuse the members of the public, which we believe was not your intention.

Being the sole association recognized by the Government of Canada as the voice of immigration consultants, CAPIC is committed to promoting the ethics and competence of our members and protecting the integrity of the profession and the Canadian immigration system. CAPIC firmly supports holding any authorized representatives who knowingly breach the code of professional conduct accountable. We also hope to work with relevant stakeholders to hold UAPs accountable, as it is a federal offence to practice immigration law without authorization as per [s. 91\(9\)](#) of IRPA.

To treat the immigration consultant profession fairly and also to avoid confusion and misunderstanding, CAPIC respectfully requests you and the provincial officials (i) to use the term “immigration representatives” instead of “immigration consultants” for communications concerning the legislation and in similar situations, (ii) to use unauthorized practitioners or UAPs when referring to people practicing without authorization, and (iii) to follow legal avenue provided by the College Act to deal with bad-actor immigration consultants instead of degrading the profession in public.



CAPIC is open to working with you and your team to address issues facing the Ontario Immigrant Nominee Program.

Yours Truly,

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

cc: Prateek Babbar, Chair, Board of Directors, CAPIC