Canadian Association of Professional Immigration Consultants
L'Association Canadienne des Conseillers Professionnels en Immigration

Mr. David Walmsley
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The Globe and Mail
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May 17, 2026

RE: "End the Sleight of Hand of Immigration Consultants" — The Globe and Mail Editorial Board, May 17, 2026

Dear Mr. Walmsley,

The Canadian Association of Professional Immigration Consultants (CAPIC–ACCPI) is the only association recognized by the Government of Canada as the national voice of Regulated Canadian Immigration Consultants (RCICs) and Regulated International Student Immigration Advisors (RISIAs). We represent over 4,000 members across every province and territory. We are writing to address serious factual errors and an undisclosed conflict of interest at the centre of your Editorial Board's May 17, 2026 piece.

We do so not to be adversarial. The Globe and Mail holds a position of genuine public trust, and that trust comes with an obligation to accuracy. On this editorial, accuracy was not served.

1. The Editorial's Key Source Has a Direct Financial Interest in the Outcome It Advocates

The editorial quotes Eoin Logan, described as a lawyer who files negligence claims against immigration consultants, and uses his characterization of the regulatory framework as the editorial's primary evidentiary foundation for calling for mandatory lawyer supervision of the profession.

This framing requires a disclosure the editorial does not make: immigration lawyers are direct commercial competitors of RCICs. They serve overlapping client populations, compete for the same files, and operate in the same fee market. A lawyer who litigates against immigration consultants professionally has a compounded financial interest in an outcome that subordinates or eliminates independent consulting practitioners. Quoting that source approvingly, without any disclosure to readers, is not editorial framing — it is the omission of a fact that is material under standard Canadian journalism conflict-of-interest norms, and the interest in question is the evidentiary foundation on which the editorial's entire policy prescription rests. Readers were not given the information they needed to evaluate either.

The Globe and Mail's own editorial standards require that conflicts of interest be acknowledged when they are material to the position being advocated. This one was not. It should be.

2. The Editorial Conflates Three Legally Distinct Categories of Persons

One framing in the editorial requires correction before the data is addressed. The editorial presents the College of Immigration and Citizenship Consultants (the College) as the third in a chain of failed regulators. That framing collapses a material distinction. The Canadian Society of Immigration Consultants and the Immigration Consultants of Canada Regulatory Council were industry-led self-regulatory bodies. The College, established under federal statute in 2019 and operational only since November 2021, is the first true public-interest statutory regulator in this sector. It is not the third attempt at the same model. It is the first attempt at a substantively different one — and the editorial's call to abandon it after less than five years prejudges a framework that has not yet been allowed to mature.

Throughout the editorial, "immigration consultants" is used as a single category that encompasses RCICs in good standing, RCICs who have committed misconduct, and unauthorized practitioners (UAPs) operating entirely outside any regulatory framework. These are three legally distinct categories, and conflating them is not a rhetorical simplification — it is a factual error with consequential policy implications.

The College established under the *College of Immigration and Citizenship Consultants Act,* S.C. 2019, c. 29, currently licenses approximately 12,000 RCICs. The editorial itself notes that the majority of the College's 1,375 open cases are attributable to 126 licensees — approximately one percent of the licensed population. That data point, which the editorial cites and then ignores, directly refutes the editorial's own premise. It does not describe a profession in systemic failure. It describes a regulator successfully identifying and concentrating its enforcement attention on roughly one percent of its licensee population — the precise pattern any functioning professional regulator should exhibit, and one consistent with discipline data published by Canadian law societies and provincial medical colleges. A one-percent misconduct cluster is not the basis for dismantling a regulatory framework. It is the basis for resourcing it.

The most serious harms catalogued in the editorial — fraudulent job-offer schemes, falsified applications, and manipulation of refugee claim processes — are concentrated in the UAP tier: UAPs who hold no licence, answer to no regulator, and would not be reached by the lawyer-supervision model the editorial proposes. The editorial itself acknowledges this in a single qualifying phrase: 'many of the recent problems in immigration have been linked to licensed or unauthorized consultants.' That 'or' carries the entire weight of the editorial's argument. A reform that targets the 12,000 RCICs while leaving the UAP population untouched is, by construction, a reform aimed at the wrong actors.

3. The Mandatory Lawyer Supervision Proposal Is Not Supported by the Evidence the Editorial Cites

The editorial's central recommendation — that immigration consultants be required to work under the supervision of lawyers — is presented as a reform measure. It is, structurally, a market consolidation proposal: it would transfer a federal professional licensing framework governed by the *Immigration and Refugee Protection Act*, S.C. 2001, c. 27 (IRPA), to 14 provincial and territorial law societies that have no mandate, no expertise, and no experience administering federal immigration law.

The editorial points to Ontario paralegals as its model. This analogy does not hold. Ontario paralegals in their core practice areas are not supervised by lawyers — they are independently licensed by the Law Society of Ontario under the *Law Society Act,* R.S.O. 1990, c. L.8. The editorial's own proposed model contradicts the analogy it invokes.

The practical consequence of mandatory lawyer supervision would not be better consumer protection. It would be higher fees, narrower access, and the elimination of a professional community that has, over two decades, built deep roots in linguistically diverse, lower-income, and internationally-connected applicant communities that the established immigration bar — concentrated in major-city corporate practice and priced accordingly — does not, in practice, reach. The clients most vulnerable to fraud are, in many cases, precisely those who currently rely on affordable, community-connected RCICs. The editorial's proposed remedy would remove those practitioners from the market.

That is not reform. That is the transfer of market share from one profession to another, with the public interest invoked as cover.

There is, however, a legitimate and urgent role for law societies in this conversation — one the editorial entirely overlooks. Unauthorized representatives who provide immigration advice for a fee are, in many instances, practising law without a licence. Under IRPA s. 91(9), the provision of immigration legal advice for consideration by a UAP is a federal offence. But the practice of law without a licence is also a provincial offence in every Canadian jurisdiction — governed by the very law societies the editorial now proposes as immigration's new regulators. If those law societies were actively enforcing their own unauthorized practice provisions against individuals who hold themselves out as immigration advisors without a law licence or an RCIC designation, a meaningful portion of the harm the editorial describes would already be diminished. Law societies are not passive bystanders in this problem. They are co-responsible parties with enforcement tools they have not yet deployed. CAPIC calls on them to use those tools — in active partnership with the College, not as a proposed replacement for a federal regulatory framework that serves a distinct and necessary public function.

4. What the Evidence Actually Supports

CAPIC has been on record for years calling for exactly the enforcement improvements that would address the harms the editorial describes. They do not require dismantling the existing regulatory framework. They require resourcing and clarifying it:

(1) A clear, legislated interagency enforcement mandate against unauthorized representatives, with defined roles for the College, the Canada Border Services Agency, and the RCMP.

(2) Defined maximum timelines for discipline case adjudication, with interim practice restrictions available in serious cases so that a complaint under investigation does not leave a licensee free to continue practicing for years.

(3) A real-time, publicly searchable national registry of authorized immigration representatives, accessible in multiple languages, so that prospective clients can verify credentials before engaging anyone.

(4) Mandatory IRCC referral protocols requiring the department to notify the College when an application bears indicators of fraudulent representation — rather than waiting for complaints from clients who fear immigration consequences if they speak up.
(5) A formal federal-provincial enforcement partnership between the College and Canadian law societies to pursue unauthorized practice jointly. Individuals who provide immigration legal advice for compensation without an RCIC designation or a law licence are simultaneously violating IRPA s. 91(1) and provincial law society statutes. Both regulators hold enforcement authority. Neither has deployed it in a coordinated, systematic way. A joint enforcement protocol — modelled on existing interagency frameworks — would give both bodies a shared interest in protecting the public, rather than a competitive interest in replacing each other.

These are achievable, targeted, evidence-based reforms. They do not appear in the editorial, because the editorial's conclusion was reached before the evidence was examined.

Our Request

We ask The Globe and Mail Editorial Board to do three things.

First, publish a correction acknowledging that the editorial's central source has a direct commercial interest in the regulatory outcome the editorial advocates, and that this interest was not disclosed to readers.

Second, publish a correction clarifying the distinction between RCICs and UAPs — a distinction that is legally material and that the editorial consistently collapses.

Third, allow CAPIC–ACCPI space to respond to your readers directly, in the format The Globe and Mail considers appropriate — whether as a letter to the editor, a counterpoint column, or an op-ed. Over 12,000 RCICs, and the hundreds of thousands of clients they serve annually, are owed that.

CAPIC–ACCPI is available to discuss any of the above at your convenience. We welcome a conversation — and we are prepared to provide member data, field documentation, and regulatory analysis in support of the corrections we are requesting. We would also welcome the opportunity to speak with The Globe and Mail about what a genuinely collaborative enforcement model between the College, law societies, and federal agencies could look like in practice. That is the conversation Canadians deserve. It is not the one your editorial started.

Sincerely,

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

cc: CAPIC–ACCPI Board of Directors
Hon. Lena Metlege Diab, Minister of Immigration, Refugees and Citizenship