



Canadian Association of
Professional Immigration Consultants

L'Association Canadienne des
Conseillers Professionnels en Immigration

CAPIC's Submission Regarding the 2026 Consultations on Immigration Levels

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CAPIC's Submission Regarding the 2026 Consultations on Immigration Levels

The Canadian Association of Professional Immigration Consultants (CAPIC) thanks Immigration, Refugees and Citizenship Canada (IRCC) for inviting CAPIC to submit a submission regarding the 2026 consultation on immigration levels.

This submission is based on input from CAPIC members and research conducted by CAPIC's research team and follows the order of the questions in the publicly available online [survey](#).

All CAPIC's submissions are available on the [Advocacy](#) web page of the CAPIC website. CAPIC authorizes IRCC to publish this written submission in its subsequent reports.

Answers to questions in the online survey on immigration levels

Qs 1 to 7: Answers to demographic questions

CAPIC is a not-for-profit organization governed by the [Canada Not-for-profit Corporations Act](#), SC 2009, c. 23. It is the professional organization representing the interests of our members, namely, Canadian immigration and citizenship consultants who are a federally regulated legal profession under the [College of Immigration and Citizenship Consultants Act](#), SC 2019, c. 29, s. 292 (College Act). Immigration and citizenship consultants are authorized to practice Canadian immigration law by [s. 91\(2\)\(c\)](#) of the *Immigration and Refugee Protection Act*, SC 2001, c. 27 (IRPA). Immigration and citizenship consultants include Regulated Canadian Immigration Consultants (RCICs) and Regulated International Students Immigration Advisors (RISIAs). Our members who are RCICs are also authorized to practice Canadian citizenship law by [s. 21.1\(2\)\(c\)](#) of the *Citizenship Act*, RSC 1985, c. C-29 (Citizenship Act).

CAPIC is the leading voice in the Canadian immigration and citizenship sector, advocating for competency, ethical conduct, and consumer protection in the immigration and citizenship consulting and legal service industry by serving our 4,000 members. The association provides continuing professional education and practice resources to help members maintain competence, build new skills, and connect with peers.

Headquartered in Toronto, CAPIC operates remotely across Canada and provides services to members in both English and French.

CAPIC's members are authorized representatives, including Canadian lawyers. Our members are either Canadian citizens or permanent residents. They are based in Canada and abroad and serve communities in both urban and smaller population centres.

Qs 8-17: Demographic questions for individuals affiliated with an organization

These demographic questions apply to individuals and therefore do not apply to CAPIC. In addition to this submission, we have distributed the survey to members who may choose either to provide input for inclusion in this submission or to complete the survey independently in their personal capacity.

Q18: Whether the reduced Immigration Levels Plan and approach of restoration of balance and control in the immigration system affected CAPIC and its members and the impact of the approach

CAPIC supported the Plan and its overall approach. For permanent resident admissions, we recommended considering manageability, sustainability, permanent resident retention, naturalization rates, and diasporic demographics.¹ For temporary resident admissions, our research indicated that the available data did not support the view that growth in temporary resident numbers would benefit Canada.²

CAPIC was affected in two ways:

First, CAPIC is indirectly affected through the impact on our members. Although the calibration is moving in the right direction, the rapid succession of policy changes created a challenging operating environment for authorized representatives, who have to continuously adapt to evolving requirements while continuing to provide clients with accurate, ethical, and competent advice. This pace of change also made long-term planning and managing client expectations more difficult.

¹ CAPIC, "CAPIC's Submission Regarding the 2025 Consultations on Immigration Levels," posted August 15, 2025, [online](#), pp. 8-11.

² *ibid*, p. 12.

Second, both CAPIC and our members are also directly affected by misleading information circulated by some media outlets. As a result, CAPIC has had to devote significant time and effort to correct inaccurate narratives about the

immigration and citizenship profession. Those resources could otherwise be directed toward addressing unauthorized practitioners (UAPs), a major threat to the integrity of Canada's immigration system. When measures to reduce Canada's temporary resident population were introduced,³ they should have prompted stakeholders to work together to address the issue; instead, some sought a party to blame. Some media outlets have continued to repeat misleading narratives that wrongly conflate immigration consultants with unauthorized practitioners (UAPs).⁴ These narratives create more space for UAPs by further confusing an already misinformed public about two key legal facts: (i) immigration consultants, along with other variations of immigration and citizenship consultants, are legal designations that are reserved exclusively for licensees of the College of Immigration and Citizenship Consultants (CICC) according to ss. 2 and 77 of the College Act, and (ii) UAP practice is an offence according to s. 91(9) of IRPA and s. 29.1 of the Citizenship Act.

The negative impact on CAPIC and our members did not arise directly from the reduced immigration levels or the restorative approach. Rather, it stemmed from misleading and harmful narratives about the immigration and citizenship consulting profession at a time when broad collaboration was needed to address immigration challenges.

Q19: Changes CAPIC would recommend to future temporary and permanent resident levels and the rationale behind the recommendations

CAPIC recommends that future temporary and permanent resident levels be set according to their benefits to Canadians, the integration capacity of communities across the country, and IRCC's processing capacity. The rationale is as follows:

First, IRPA is the foundation of Canada's immigration system. S. 3(1) of IRPA states that immigration is "to permit Canada to pursue the maximum social, cultural and economic benefits of immigration." However, recent rapid

³ IRCC, "Strengthening temporary residence programs for sustainable volumes," September 18, 2024, [online](#).

⁴ See CAPIC, "Letter to Marie Woolf Requesting to Correct the Misinterpretation of the Proposed Regulatory Regime," posted August 13, 2025, [online](#). See also CAPIC, "CAPIC Calls on The Globe and Mail to Correct Critical Legal error in the "End of Sleight of Hand of Immigration Consultant," Posted May 25, 2026, [online](#).

immigration growth has coincided with concerns about a “per-capita recession,”⁵ suggesting a decline in overall living standards in Canada. Some economists had already warned in 2023 about the risks of higher immigration targets.⁶ The Business Cycle Council is examining the causes of “a decade of economic weakness,” noting that mass immigration has not improved Canada’s economic growth.⁷

Second, population growth is outpacing Canada’s capacity to deliver essential services.⁸ One example is the medical specialist referral wait times, which

reached 28.6 weeks in 2025. It is 208% longer than the 9.3 weeks in 1993. The modest decline from 30 weeks in 2024 to 28.6 weeks in 2025 may indicate an early effect of the recent reduction in immigration.⁹

Third, weak permanent resident retention and declining naturalization¹⁰ raise an important question: how can Canada better support integration so permanent residents choose to stay? Many immigrants are underemployed or working in roles that do not match their education and experience.¹¹ One survey found that 30% of people aged 18 to 34, which is the group Canada most wants to retain, would consider moving abroad in the near future.¹² Another study found that 20% of permanent residents leave within 25 years, with higher-skilled immigrants more likely to do so.¹³

Fourth, immigration levels should remain manageable to protect system integrity.

⁵ Tristin Hopper, “First reading: Immigration has been artificially juicing Canadian GDP the whole time,” the National Post, June 4, 2026, [online](#), para. 5.

⁶ Peter Mazereeuw, “‘Too much, too quickly’: economists warn of Liberal ‘pro-business’ immigration policy,” The Hill Times, December 21, 2023.

⁷ Jeremy Kronick and Philip Cross, “Canada’s Technical Recession Isn’t the Real Problem. A Decade of Economic Weakness Is.,” The CDHI Podcast, C.D. Howe Institute, June 11, 2026, [online](#).

⁸ Daniel Hiebert, “Balancing Canada’s Population Growth and Ageing Through Immigration Policy,” C.D. Howe Institute, released May 1, 2025, [online](#).

⁹ Mackenzie Moir and Nadeem Esmail, “Canada’s median health-care wait time hits 30 weeks—longest ever recorded,” Fraser Institute, released December 9, 2025, [online](#).

¹⁰ Feng Hou and Garnett Picot, “The decline in the citizenship rate among recent immigrants to Canada: Update to 2021,” Statistics Canada, released February 28, 2024, [online](#).

¹¹ Shamira Madhany, “Immigration levels, and the untapped potential of Canadian newcomers,” The Hill Times, December 18, 2024, p.5.

¹² Institute for Canadian Citizenship, “The Leaky Bucket: A Study of Immigrant Retention Trends in Canada,” released October 31, 2023, p.5, [online](#).

¹³ Institute for Canadian Citizenship, “The Leaky Bucket 2025: Retention Trends in Highly Skilled Immigrants and In-Demand Occupations,” released November 18, 2025, [online](#), p.3.

Backlogs existed before COVID-19 and worsened during the pandemic.¹⁴ Six years later, it remains a significant issue. IRCC data show that 935,000 of its 2,154,300 applications exceeded its service standards, representing 43% of its inventory.¹⁵ Levels beyond a manageable scale also create integrity risks. For example, of 153,000 instances of non-compliance among international students between 2023 and 2024, only 4,057 were investigated.¹⁶

Q20: Specific regional pressures, opportunities, or demographic trends to be considered when planning future immigration levels

Regional pressures and opportunities vary across Canada. Outside Quebec, one key consideration is Francophone immigration to minority-language communities. Canada exceeded its 2025 Francophone immigration target of 8.9%, and the targets rise to 9% in 2026, 9.5% in 2027, 10.5% in 2028, and 12% by 2029.¹⁷

Francophone immigrants outside Quebec face several barriers, including overly general information in pre-arrival services, housing shortages, limited settlement support, and challenges with professional integration.¹⁸ Language training also appears insufficient: in 2024–2025, only 1,341 admitted Francophones received these services, out of a two-year total of 60,195.¹⁹ We also noted that while employment income among French-speaking immigrants rose gradually, English-speaking immigrants in Quebec fared worse and had the lowest employment rates.²⁰

¹⁴ Laura Schemitsch, “No more excuses for our immigration backlog,” the Canadian Bar Association, posted February 4, 2022, [online](#).

¹⁵ IRCC, “Understanding IRCC’s application inventories,” data as of March 31, 2026. The data is updated by IRCC regularly, and thus a printout copy of the data is retained.

¹⁶ Office of the Auditor General of Canada, “International Student Program Reforms,” modified March 23, 2026, [online](#).

¹⁷ IRCC, “Canada exceeded its Francophone immigration target for 2025,” modified January 19, 2026, [online](#).

¹⁸ Mariève Forest, Guillaume Deschênes-Thériault and Virginie Cimonde from Sociopol, “Experiences of French-speaking Immigrants in Rural Communities in Northern Ontario and Northern New Brunswick,” modified July 11, 2025, [online](#).

¹⁹ IRCC, “Dashboard on Francophone immigration outside Quebec – 2025,” modified May 12, 2026, [online](#).

²⁰ IRCC, “Economic outcomes of official language minority permanent residents,” August 2025, [online](#).

Q21: Long-term considerations and priorities to guide Canada's immigration system beyond 2029

CAPIC proposes three measures to guide the long-term direction of Canada's immigration system:

First, adopt a Canada- and Canadian-centred approach aligned with the objectives set out in [s. 3](#) of IRPA. In planning long-term immigration levels, this approach should prioritize: (i) affordability, (ii) strong employment prospects for young people, and (iii) safe communities.

Housing affordability remains a serious concern, intensified by a sharp increase during the COVID-19 pandemic.²¹ The Parliamentary Budget Officer (PBO) estimated that 690,000 additional housing units would be needed over 2025 to 2035 to eliminate the housing gap in Canada, in addition to the projected 2.5 million net units being added to Canada's housing stock by 2035.²² If this gap cannot be closed, Canada may need to consider more restrictive immigration levels while prioritizing the retention of young Canadians and permanent residents.

Statistics Canada reported that about 4 million Canadians were living abroad in 2016, including roughly 1.3 million who were born in Canada.²³ A recent study found that nearly two-thirds of Canadian diaspora left Canada in search of better economic opportunities, particularly young, well-educated Canadians.²⁴ This is the very talent Canada needs to retain as it faces an aging population and a long-term decline in birth rates since 1962.²⁵ Statistics Canada also reported that, in 2021, most Canadians moving abroad were between the ages of 20 and 40.²⁶ Retaining Canadian talent as well as permanent residents can help ease housing pressures and strengthen confidence in employment prospects among young Canadians and permanent residents.

²¹ CMHC, "The way back to housing affordability," posted January 9, 2025, [online](#).

²² Office of the PBO, "Household Formation and the Housing Stock: Estimating the Housing Gap in 2035," published August 26, 2025, [online](#).

²³ Statistics Canada, "Study: The Canadian diaspora: Estimating the number of Canadian citizens who live abroad," released April 13, 2022, [online](#).

²⁴ Lucia Lovacicova, "Canadians Abroad: Overview of Recent Research and Implications for Public Policy," accessed August 15, 2025, [online](#), p.22.

²⁵ Statistics Canada, "Population Projections for Canada (2025 to 2075), Provinces and Territories (2025 to 2050)," released January 27, 2026.

²⁶ Statistics Canada, "Portrait of Canadian emigration," released March 18, 2026, [online](#).

Second, adopt a quality-over-quantity approach. Statistics show that rising immigration levels have not reversed Canada's decades-long decline in birth rates,²⁷ even though permanent resident admissions have favoured foreign nationals aged 18 to 35, with age being a key factor in both federal and provincial immigration programs for skilled workers. Before the 2024 measures to reduce temporary resident numbers, Canada had experienced rapid growth in both international students and temporary foreign workers. As of March 31, there are 1,510,580 work permit holders and 431,160 study permit holders in Canada.²⁸

The transition rates from temporary to permanent residence were 44% in 2024, 48% in 2025, and 59% from January to March 2026.²⁹ IRCC data estimated that the undocumented population could be as high as 500,000.³⁰ A large number of temporary residents alongside a substantial undocumented population, many of whom have little or no pathway to permanent residence, creates significant risk to the integrity of the already vulnerable Canadian immigration system. A quality-over-quantity approach would reduce pressure on the system and help restore order and integrity.

Third, set up post-arrival assessment parameters. Although [s. 28](#) of IRPA sets clear residence obligation requirements for permanent residents, Statistics Canada data show that the five-year retention rate declined from 2012 to 2016³¹ and recent studies suggest this trend is continuing.³² This onward migration is concerning given Canada's significant investment in attracting foreign talent only to lose it over time. Post-arrival assessment parameters could help refine admission criteria to better support the integration and retention of permanent residents.

Q22: Challenges, barriers, or concerns exist in the immigration system that affect people's ability to come to Canada and achieve positive outcomes

CAPIC considers immigration fraud the most serious challenge facing the immigration system, while also recognizing that unclear messaging creates additional barriers.

²⁷ Supra, note 21.

²⁸ IRCC, "Understanding student and temporary worker numbers in Canada," data as of March 31, 2026. As the numbers are updated from time to time, a copy of this web page is retained.

²⁹ *ibid.*

³⁰ IRCC, "Question Period Note: UNDOCUMENTED MIGRANTS," April 24, 2024, [online](#).

³¹ Statistics Canada, "Provincial variation in the retention rates of immigrants, 2022," released February 14, 2024, [online](#).

³² Supra, Note 11. See also, the Institute for Canadian Citizenship, "Report, Immigrants leaving Canada in growing numbers," released October 31, 2023, [online](#).

Unauthorized practitioners (UAPs) pose one of the most serious threats to Canada's immigration system.³³ Their activities harm vulnerable applicants, erode public confidence, and impose costs on the system. By knowingly violating IRPA,³⁴ UAPs assist applicants in entering and remaining in Canada regardless of eligibility or admissibility requirements. UAP practice compromises the integrity of Canada's immigration system, which not only paves the way for inauthentic applicants to enter Canada but also adversely affects genuine applicants' application outcomes.

Some unclear messages make an already complex system even harder for applicants to navigate. For example, the statement "You don't need to hire a representative!" appears prominently on the first page of IRCC's "Learn about representatives." CAPIC understands that IRCC's intent may be to help reduce costs for applicants. However, maintaining competent and ethical immigration

practice requires lawyers and Regulated Canadian Immigration Consultants (RCICs) to keep up with ongoing legislative, regulatory, and policy changes. It is unrealistic to expect the average applicant to manage this alone. Messages of this kind may inadvertently create more space for UAPs, who can exploit them in ways that further confuse applicants.

You don't need to hire a representative!

It's your choice. Using one will not draw special attention to your application and doesn't mean we'll approve it.

You can get all the [forms and instructions](#) you need to apply for a visa, a permit or citizenship for free on this website. If you follow the instructions, you should be able to fill out the forms and submit them yourself.

Beware of fraudulent representatives. Learn more about [how to protect yourself from fraud](#).

Q23: Feedback about our experience completing this survey

The survey is an effective tool for public engagement. CAPIC recommends monitoring response rates and, if adult participation remains low, introducing measures to increase participation.

³³ See Nicholas Keung, "Indian education agent arrested, charged in fake-admission-letter scandal in Canada," Toronto Star, updated July 19, 2023, [online](#). See also Kerry Campbell, "Everybody knows' PNP immigrants were bypassing P.E.I., accused told investigator," CBC, updated January 9, 2019, [online](#); *Ge v. Canada (Citizenship and Immigration)*, 2017 FC 594; Eric Rankin, "Biggest immigration fraudster in Canadian history left \$900K fine unpaid," CBC News, updated June 29, 2018, [online](#); *Beiene*, May 15, 2010 (Chairperson's Delegate), [online](#).

³⁴ According to [s. 91\(9\)](#) of IRPA, UAP practice is an offence.

CAPIC values IRCC's ongoing engagement and considers email, written submissions, group discussions, meetings, and hybrid events the most effective communication channels for CAPIC.

Recommendations

Based on the analysis above, CAPIC recommends the following:

1. **Accurate narratives for system integrity:** strengthen public and stakeholder education to counter misleading and harmful narratives about the immigration and citizenship consulting profession.
2. **Sustainability and manageability:** set immigration levels based on their benefit to Canadians, communities' integration capacity across the country, and IRCC's processing capacity.
3. **A Canadian-centred approach:** set immigration levels with priority given to factors that improve Canadians' quality of life, including housing, health care, and employment prospects.
4. **Quality over quantity:** prioritize admissions based on applicants' human capital factors and likelihood of integration.
5. **Retention and integration:** establish post-arrival assessment parameters and work with provinces and territories to support immigrant integration and retention.
6. **UAP enforcement:** engage stakeholders across the system to strengthen action against unauthorized practice and protect system integrity.

Conclusion

Immigration shapes Canada socially, culturally, and economically. Reflecting on lived experience can help preserve a system grounded in integrity and transparency. As a leading voice in Canada's immigration sector, CAPIC is pleased to contribute solutions to the immigration challenges facing the country.

Contact Us

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