



Canadian Association of  
Professional Immigration Consultants

L'Association Canadienne des  
Conseillers Professionnels en Immigration

# CAPIC's Submission on the 2023 to 2025 Immigration Levels Plan

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## CAPIC's Submission on the 2023-2025 Immigration Levels Plan

CAPIC is pleased to submit a submission on the matter of 2023-2025 Immigration Level Plans in lieu of the requested online survey sent to relevant stakeholders. A submission inclusive of members' input and relevant research allows for a more robust response. The structure of the submission follows the sequence of the questions in the survey except for survey questions that are answered either in this preamble or in the conclusion. Please note questions are answered in a more generalized manner rather than from a regional perspective.

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

### Background

#### 1. About CAPIC

The Canadian Association of Professional Immigration Consultants (CAPIC) is the professional organization representing the interests of Canadian Immigration Consultants. The organization advocates for competency, ethical conduct, and consumer protection in the immigration consulting industry. CAPIC's mission is to lead, connect, protect, and develop the profession, serving the best interests of its nearly 5000 members. It is the only association recognized by the Government of Canada as the voice of Canadian immigration and citizenship consultants. CAPIC is a major stakeholder [consulting](#) with federal and provincial governments and their respective departments on legislation, policy, and program improvements and changes. CAPIC is a member-driven organization with membership limited to those who are Canadian citizen/permanent resident authorized representatives. CAPIC members reside across Canada and some outside of Canada.

#### 2. The most important reasons for Canada to have a robust immigration system

All reasons for Canada to have a robust immigration system listed in the survey are valid. Please note the ranking order when compared to other reasons:

1. address economic and labour force needs and bring new skills to Canada
2. reunite families, and support community development

To support this ranking, the rationale is noted below:

First, a robust immigration system is to serve the purpose of attaining the objectives set out in [ss. 3\(1\) and \(2\)](#) of the *Immigration and Refugee Protection Act*, SC, 2001, c. 27 (IRPA) (see appendix). The above-mentioned reasons closely reflect the immigration objectives prescribed in s.3(1) of IRPA and the fourth, refugee protection in s.3(2) of IRPA.

Second, Canada's population increase and diversity can be attributed to a robust immigration system. [Census population counts by province or territory in Canada at a Glance, 2022](#) by Statistics Canada provides insights into the changing social fabric of Canada, noting the differences between population growth derived from immigration vs natural birth. From 2011 to 2021, Quebec as the province has the sole selection power over immigration and had a population growth of 7.6%, which took the eighth place in population growth. The fastest growth rate went to Yukon at 18.7%, whose immigration admission is rather low. The decrease in population occurred not in Nunavut, the only territory that doesn't have its own immigration program, but in Northwest Territories and /Newfoundland and Labrador. Nunavut's population growth was 15.5%, which was in third place. Given this data, it is important to consider the level increases that best meet the objectives of IRPA as well as the needs of the country.

Third, supporting Canada's economic recovery, Francophone immigration and the development of minority official languages communities belong to the area of economic needs and community development.

Finally, a strong economy and well-developed communities are the foundations for Canada to fulfil its international obligations of refugee protection and carry on its humanitarian traditions.

### **3. The overall total immigration plans for 2024 and 2025 and future plans**

The 2023-2025 Immigration Levels Plan (Levels Plan) tabled in Parliament on November 1, 2022, with the permanent resident admission targets of 485,000 in 2024 (range: 430,000-542,500) and 500,000 in 2025 (range: 442,500-550,000). The 2024 planned admission distribution to the economic class, family class, and classes on humanitarian grounds are 281,135, 114,000, and 89,865 respectively, for which, the percentage for the three correspond to 58%, 23.5%, and 18.5%. The targeted plan for 2025 equates to 1.25% of Canada's population.

While CAPIC understood that the plans were based on admissions in previous years and the impact of immigration on the economy and population growth of Canada, two areas of general concern have been identified in [LANG – 2023-2025 Multi-Year Levels Plan – December 6, 2022](#). One is the regional “ability to absorb high volumes of new immigrants.” Another concern is the length of time it takes for immigrant wages to “converge with average Canadian earnings.” (See Supporting Facts and Figures section). Given that there is a need to encourage immigration settlement across Canada to lessen the impact on major cities and their infrastructure, it is reasonable to take regional capacities of immigrant integration and retention into consideration when laying the Levels Plan.

It is further noticed the steep increase in the [planned admission](#) of the classes on humanitarian grounds compared to [previous years](#), which makes the family class admission with the least growth. Canada has become a leader in resettling refugees. It’s understandable that there is momentum to maintain this position given Canada’s long-standing humanitarian tradition as well as international obligations. The only concern is whether this could put Canadians’ family reunification second to resettling refugees and humanitarian considerations.

Moving into the future beyond 2025, whether the immigration levels should increase, stabilize, or decrease, as well as how the admissions are to be distributed among the three categories, depends on the levels being settled on the premise that the concerns of integration, underemployment, and the priority of family reunification are duly addressed.

We would like to clarify that the input to the survey questions from an increased immigration perspective do not represent a position in support of the increase or decrease of immigration steadily year by year. Rather, the position or view is built on the presumption that the premise, i.e., the mechanisms to address the issues of integration, underemployment, and prioritized family reunification, is in place when considering annual immigration levels.

#### **4. The important factors for investment and aspects in supporting increased immigration**

We would rank the most important contributing factors in question 12 in the following order with a modification to the last item to include both pre-school and kindergarten:

1. housing,
2. healthcare services, and
3. schools, including pre-school, kindergarten, primary, and secondary.

These are considered most important because they are necessities that need to be addressed to retain newcomers as well as allow Canadians to maintain their

quality living standards without being stressed by high housing costs, long waiting times for healthcare, quality education or limited school space for their children.

Affordable housing has been an issue across Canada for years. With all levels of government implementing [measures](#) to address the issue, the trend of cost increase in either purchasing or renting a place to live persists. The issue reached its all-time low in late 2022 according to a [CBC report](#). As admission of newcomers increases, more housing units are in demand. Without effective measures in place, the housing situation will continue to worsen.

As for healthcare services, long waiting times for medical treatment are all too common. The shortage of hands in healthcare sectors has been another issue troubling Canadians generally. The most recent [report](#) by the Fraser Institute, an institute that has been following this issue for three decades, shows that the waiting time continues to increase. The average waiting time in 2022 is “195% longer than it was in 1993.” With the increase in admission of immigrants, adequate investment in this sector must be in place.

Though there’s no indication of parents having difficulties enrolling their children to primary and secondary schools, recent [population estimates](#) show an increase in the number of school age children. Adding the number of immigrant children in the same age, planning ahead by investing to increase the capacity of primary and secondary school could be an appropriate approach. In addition, parents may have difficulties securing their children’s placements in [childcare](#). Given Canada’s immigration system primarily targets young people, this existing shortage is a gap to be closed if future levels plans are to keep increasing permanent resident admissions.

## 5. Most useful aspects to newcomers

We regard the following three most useful aspects to newcomers:

1. language training,
2. foreign credential recognition support, and
3. help accessing government or community services

These are ranked as such to emphasize both the language training and foreign credential recognition support that is needed from all levels of government.

[Improving Settlement Services Across Canada](#), a study report (the CIMM Report) released by the Standing Committee on Citizenship in June 2019 pointed out that “[l]anguage skills are necessary for successful settlement in communities and important to enter the labour market” (p.18). This echoes the findings in [Which immigration selection factors best predict the earnings of economic principal applicants?](#), which is a research report issued by the Policy Research Branch of

IRCC. The CIMM Report noted the limited capacity of such training programs that causes new immigrants to have to wait, which is a barrier to be overcome.

[Evaluation of the Foreign Credential Recognition Program](#) (the FCRP Evaluation) conducted by the leading department, Employment and Social Development Canada (ESDC), in April 2022, demonstrated that foreign credential recognition is still presently an issue with the misalignment between the immigration system and the regulated professions in Canada, which are mostly provincially regulated. (See Main Findings #1). It is an issue that has been going on for decades leading to underemployment of highly skilled foreign trained professionals.

A wide range of government or community services is available to immigrants. The instructions are clear, and the services are generally easily accessible. It's commendable that the Department has started issuing pre-arrival letters to direct soon-to-be immigrants to access such services. However, locating applicable information in a sea of information is difficult for most immigrants, therefore continuing to make this information easily accessible remains key.

## **6. Better attract and retain newcomers to rural or remote areas and to small and medium-sized communities.**

Support for communities to play a larger role in the settlement and integration of newcomers is first in our recommendations. Increased access to settlement services is vital to this process. The CIMM Report identified two factors that affect rural immigration negatively: Lack of transportation and housing and lack of language services (pp. 44 to 45).

Creating dedicated or community-specific pathways, either for permanent or temporary purposes or implementing enhanced promotions of such communities, may attract newcomers to these communities. However, without the issues identified by the CIMM being adequately addressed, the newcomers may not stay in the communities. These measures may backfire, and some may take advantage to use community-specific pathways as an immigration shortcut to move to Canada but without the intention to stay in the communities that have accepted them.

In addition, communities often know best what they need to attract and retain newcomers, namely, what support they need the most and the role to play in their capacity. It is crucial that communities play a vital role in consultation for an annual levels plan.

## **7. Increasing Francophone immigration**

We listed the most important mechanisms provided for selection that may work for increasing francophone immigration, which will be brought forth by the coming into force of the amended *Official Languages Act* ([Bill C-13](#)), with minor modifications:



1. improved selection mechanisms for bilingual immigrants,
2. strengthened support for French-speaking temporary residents (workers and students) to transition to permanent residence, and
3. increase settlement and community services, including both English and French language training for French-speaking newcomers in Francophone minority communities, and French language training for Canadians and permanent residents in English-speaking regions.

CAPIC supports this endeavor to support Francophone immigration while acknowledging the challenges that can exist to retain French immigrants in various communities.

#### **8. Permanent economic programs are responding to economic and labour force needs.**

We do not have enough data to conclude if permanent economic immigration programs are responding to economic and labour force needs. [\*The Occupational outcomes of immigrants: Lower versus higher skilled jobs\*](#), a report by the Research and Evaluation Branch of the Department, indicates that the current immigration is under the pressure of labour shortage driven by two drivers: Economic cyclical and post-pandemic demand. Both are of short term instead of long term (p.41). Moreover, this report shows that the rate of working in low-/skilled jobs by university-educated immigrants is 12% percent higher than their native Canadian counterparts (p.43). The report did not find a reasonable explanation for this phenomenon. The fact that most economic programs are based on human capital selection makes us believe further exploring this myth is worth pursuing. It could be one of the factors to see how well the permanent economic programs respond to economic and labour force needs.

#### **9. The way federal selection contributes to provincial and territorial immigration efforts.**

We suggest a workable approach for the federal selection contributing to regional economic growth is to take the regional economic disparity into consideration. Provinces with dense populations, e.g., Ontario, Quebec, British Columbia, considered such disparity and favour more toward candidates whose destinations are remote. Some have pilot programs specifically for admissions of foreign nationals to move to such communities permanently. For example, BC PNP's [\*Regional Pilot\*](#) is a good example; [\*Alberta\*](#) has two streams for worker and entrepreneur candidates respectively in this effect, too. The current Rural and Northern Immigration Pilot Program (RNIP) reflects this approach, but the RNIP only applies to participating communities. To allow rural areas and remote places to benefit from immigration evenly, setting regional destinations as a



Comprehensive Ranking System (CRS) factor. Awarding points to Express Entry (EE) candidates who are working in less developed regions could be considered.

## **10. The impact of category-based Express Entry selection**

The categories are selected based on stakeholders' input collected by IRCC through a [public consultation](#) and ran from November 29, 2022 to January 16, 2023. Stakeholders included provinces and territories, members of industry, unions, employers, workers, worker advocacy groups, settlement provider organizations and immigration researchers and practitioners.

Without adequate data to analyze the impact of EE category specific draws, two things are clear: (1) it could cause more uncertainty to EE candidates whose occupations don't belong to the six categories; (2) it could cause difficulties for EE candidates to anticipate their chances of getting an invitation to apply in the beginning.

In addition, the consultation ran for around 1.5 months, but it fell in the period of 2022 Christmas and New year holidays. 2960 organizations were invited to provide feedback, but only 26 submissions were received. Online responses were 236. For a major consultation process, the consultation time might not have been adequate, and the participants might not be representative.

The Department's [2021 EE Year End Report](#) (the [most recent report](#) publicized on the Department's website) shows some of the chosen categories are among those most common primary occupations for ITAs from 2019 to 2021 (see Tables 22 to 23). It also shows some of the chosen categories are among those with a valid job offer for ITAs from 2019 to 2021 (see Table 25 to 27). The Report does not show the relation between the most common primary occupations and the ones with a valid job offer. Therefore, it's hard to conclude if some chosen categories are already in an advantageous position before the change.

## **11. Economic Mobility Pathways Pilot and approaches to be adopted for economic immigration programs to better support resettlement of refugees and displaced people**

The Economic Mobility Pathways Pilot is an initiative that the Government of Canada and the [UNHCR](#) collaborate together. One of the concerns identified by the UNHCR when the Pilot was implemented is "[t]he shift from vulnerability to human capital potential also challenges some of the internal assumptions that project partners held about refugees." (P.6, [The Economic Mobility Pathways Project – Policy Principles and Lessons Learned](#)).

CAPIC echoes this concern. Many refugees bring needed economic skills that are targeted by EMPP, yet this does not discount the traditional notion of a refugee. A refugee can be both those things – have education and economic skills and yet still be a refugee. It is important that both these views are acknowledged

## **12. Improvement for equitable access to opportunities for permanent residence**

First, we'd repeat our view that diversity is the positive result of a robust immigration system. Diversity, while not being a primary goal of an annual levels plan, nevertheless, brings tremendous benefits in terms of creativity, innovation and strategic thinking to the Canadian landscape, so it remains incredibly important that all have equitable access in seeking opportunities for permanent residence.

Second, Canadian work experience and education put immigration candidates with these factors in a more advantageous position. While these two factors contribute to integration positively, it may put some well-educated and experienced foreign nationals at the peak of their careers without either, who could become the members of the most productive immigrant groups, at the low end of the selection pools. This could be a bias worth looking into for positive effects of diversity through immigration. Further, the notion that Canadian experience is a "must" requirement for many employers is an aspect that must be considered when examining equitable opportunities for permanent residence.

## **Recommendations**

Based on the factors in the background section, CAPIC's recommendations are as follows:

1. Examine regional capacity of integration and retention of immigrants as a prerequisite when laying immigration levels plan.
2. Examine the admissions of family class and the classes on humanitarian grounds and strike a proper balance between the two.
3. Explore workable mechanisms to address the housing issue, reduce healthcare service waiting time, and the shortage of pre-school and kindergarten space.
4. Increase the capacity of primary and secondary schools, so that they are aligned with the school-age population increase.
5. Diversify language training methods to shorten language training waiting time and afford such opportunity to more immigrants.
6. The work of "[b]uild on efforts to mitigate barriers that internationally trained individuals face as they attempt to work in positions related to their field of study" is taken on by ESDC. (Recommendation #3, the

FCRP Evaluation). We suggest ESDC seek input from stakeholders when laying out the detailed plan for this initiative.

7. Consult rural or remote areas and small and medium-size communities for their participation in the immigration levels plan for their communities.
8. Extend free French language training programs to Canadians and permanent residents in English-speaking regions.
9. Conduct research to see why the share of university educated immigrants in low skill jobs is 12% higher than their Canadian counterparts.
10. Consider incorporating regional destinations as an Express Entry factor to bring immigration benefits to rural and remote areas.

## Conclusion

This survey is a good way to engage the general public on immigration levels planning. As CAPIC is a recognized leader in Canadian immigration consulting sector, representing close to 5,000 immigration and citizenship consultants who help foreign nationals to seek permanent residence and temporary residence in Canada and help Canadians and permanent residents bring their loved ones to Canada, increased engagement with CAPIC can assist in bringing forth solutions and addressing complexities.

In addition, CAPIC has a research team, including input from its members to support the mandate of leading and developing the immigration and citizenship consultant profession, an undeniable resource to the Department that can tremendously benefit Canada's immigration system.

## Contact Us:

[www.capic.ca](http://www.capic.ca)

[Stakeholders@capic.ca](mailto:Stakeholders@capic.ca)

## Appendix

Subsections 3(1) and (2) of IRPA:

3 (1) The objectives of this Act with respect to immigration are

- (a) to permit Canada to pursue the maximum social, cultural and economic benefits of immigration;
- (b) to enrich and strengthen the social and cultural fabric of Canadian society, while respecting the federal, bilingual and multicultural character of Canada;
- (b.1) to support and assist the development of minority official languages communities in Canada;
- (c) to support the development of a strong and prosperous Canadian economy, in which the benefits of immigration are shared across all regions of Canada;
- (d) to see that families are reunited in Canada;
- (e) to promote the successful integration of permanent residents into Canada, while recognizing that integration involves mutual obligations for new immigrants and Canadian society;
- (f) to support, by means of consistent standards and prompt processing, the attainment of immigration goals established by the Government of Canada in consultation with the provinces;
- (f.1) to maintain, through the establishment of fair and efficient procedures, the integrity of the Canadian immigration system;
- (g) to facilitate the entry of visitors, students and temporary workers for purposes such as trade, commerce, tourism, international understanding and cultural, educational and scientific activities;
- (h) to protect public health and safety and to maintain the security of Canadian society;
- (i) to promote international justice and security by fostering respect for human rights and by denying access to Canadian territory to persons who are criminals or security risks; and
- (j) to work in cooperation with the provinces to secure better recognition of the foreign credentials of permanent residents and their more rapid integration into society.

(2) The objectives of this Act with respect to refugees are

- (a) to recognize that the refugee program is in the first instance about saving lives and offering protection to the displaced and persecuted;

- (b) to fulfil Canada's international legal obligations with respect to refugees and affirm Canada's commitment to international efforts to provide assistance to those in need of resettlement;
- (c) to grant, as a fundamental expression of Canada's humanitarian ideals, fair consideration to those who come to Canada claiming persecution;
- (d) to offer safe haven to persons with a well-founded fear of persecution based on race, religion, nationality, political opinion or membership in a particular social group, as well as those at risk of torture or cruel and unusual treatment or punishment;
- (e) to establish fair and efficient procedures that will maintain the integrity of the Canadian refugee protection system, while upholding Canada's respect for the human rights and fundamental freedoms of all human beings;
- (f) to support the self-sufficiency and the social and economic well-being of refugees by facilitating reunification with their family members in Canada;
- (g) to protect the health and safety of Canadians and to maintain the security of Canadian society; and
- (h) to promote international justice and security by denying access to Canadian territory to persons, including refugee claimants, who are security risks or serious criminals.