



Canadian Association of
Professional Immigration Consultants

L'Association Canadienne des
Conseillers Professionnels en Immigration

CAPIC's Submission on the 2024 Consultations on Immigration Levels

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The Canadian Association of Professional Immigration Consultants (CAPIC) is pleased to submit a submission on the matter of [2024 consultations on immigration levels](#) in lieu of taking the online survey available on the website of Immigration, Refugees and Citizenship Canada (IRCC). CAPIC believes that a submission inclusive of analysis based on our 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 **Q27**, which is provided in the paragraph following.

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.

Background

1. About CAPIC

Qs 1 to 5 – Participant's information

CAPIC is the professional organization representing the interests of Canadian immigration and citizenship 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 5,000 members who are immigration and citizenship consultants including RCICs and RISIAs. 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, regulation, policy, and program improvements and changes. CAPIC is a member-driven organization with membership limited to authorized representatives who are Canadian citizens or permanent residents. CAPIC members reside both in and outside of Canada, serving both urban and rural communities of all sizes.

2. Q6 – The most important reasons for Canada to have a robust immigration system

All reasons for Canada to have a robust immigration system listed in this question are valid. Based on our research, we would rank the following three as the most important reasons compared to others listed:

1. help address economic and labour force needs and bring new skills to Canada,
2. reunite families, and
3. sustain and strengthen communities in all regions across Canada.

The rationale for the above ranking is as follows:

First, the *Immigration and Refugee Protection Act, SC, 2001, c. 27 (IRPA)* is where the immigration system stemmed from; the system serves IRPA. Therefore, a robust immigration system is expected to attain the objectives set out in ss. 3(1) and (2) of IRPA (see appendix). The above three factors ranked closely reflect the immigration objectives prescribed in the provisions of IRPA.

Second, Canada's population increase, and diversity can be attributed to a robust immigration system. "Mass immigration brings population increase," seems a quick answer to Canada's aging population, but a long-term solution may reside in fertility instead of immigration. "The Fertility in Canada, 1921 to 2022," carries a fact that even though many countries saw a substantial decrease in fertility from 2021 to 2022, Canada's was among the largest (p.10). [Statistics](#) carries a fact that even though many countries saw a substantial decrease in fertility from 2021 to 2022, Canada's was among the largest (p.10). Since 2016, the total number of [births](#) has generally been declining in Canada. In fact, [Statistics](#) show that Canada's birth rate has been declining since 2009, which does not align with the steady increase in permanent resident admissions. The largest portion of the admissions go to economic immigrants; many of these newcomers are relatively young and should be a contributing factor to a birth rate increase. It also shows that despite the record-number admissions of immigrants from [2016 to 2021](#), the Canada's population [aging](#) is accelerating in general.

Third, supporting Francophone immigration and the development of official language minority communities can be covered by both the first and the third factors in our ranking.

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

3. The planning immigration levels

Q7 – The number of new permanent residents in general and for each class

The permanent resident admission plan for 2025 targets around 1.25% of Canada's population at the number of 500,000. The 2025 planned admission distribution to the economic class, family class, and classes on humanitarian grounds are 301,250, 118,000, and 80,750 respectively, for which, the percentages for the three correspond to 60.25%, 23.6%, and 16.15%.

Compared to 2024 levels plan's numbers, which are 281,135, 114,000, and 89,865 for the listed classes respectively, the admission of economic immigrants increased, the family class admission slightly increased, and the admission for classes on humanitarian grounds decreased. The decrease of the last one contributes to the increase of both economic class and family class admission with more to the former.

In general, CAPIC has two concerns.

First, is the processing capacity of IRCC and the integration capacity of communities across Canada. The [backlog](#) piling up since the strike of the COVID-19 pandemic has yet to be fully addressed. As of May 31, 2024, there were [878,400](#) applications in IRCC inventory, a decrease of 18,700 compared to the number of April 30's, which was 897,100. This rate of decrease was after the announcement on April 29, 2024, when IRCC announced the [pause](#) of the Self-employed Person application intake and the cap on the annual intake of each supporting organization for the Start-up Visa to reduce processing time and backlog. With applicants in and outside of Canada waiting long times to get the results of their applications, especially for those in Canada whose decisions about their futures largely depend on the results of their permanent resident applications, without an effective approach in place to clear the backlog, maintaining the same high volume of intake could worsen the backlog and bring forth some unintended consequences. Both immigration fraud preying on uncertainties brought to applicants by backlog and the rising number of judicial reviews could be such consequences. As for the integration capacity of communities across Canada, we presume the consultation with the provinces and territories regarding their integration capacity directed by the House of Commons in its [Vote No. 636](#) was carried out by the Forum of Ministers Responsible for Immigration ([FMRI](#)), "an FPT decision-making body with the goal of supporting a flexible, timely and effective immigration system for Canada." The latest news release about the FMRI on May 10 mentions that "Ministers shared the unique perspectives and realities facing their jurisdictions." However, no details are included. We failed to locate the report on the gap between the

resources needed to facilitate the 2024 immigration levels plan requested by Vote No. 636 on [IRCC's reports to Parliament](#).

Second, is the place of the family class in the levels plan. The levels set for the family class admission and classes on humanitarian grounds. The former admission numbers in [2021](#) and 2022 were 81, 423 and 97,338; the latter were 73,377 and 89,699. If we compare the admissions of these two in [2019](#) (2020's admissions were impacted by COVID-19 and thus not comparable), the former was 91,311 and the latter 53,211. The comparison of the admission trend of the two seems to indicate that the family class admission slows down while the latter speeds up.

The position of Canada being a leader in resettling refugees carries Canada's long-standing humanitarian tradition and its international obligations. However, such resettlement and admissions are shouldered by Canadians and permanent residents of Canada regardless of the category of the programs. The concern based on the data is whether Canadians' family reunification is placed second to resettling refugees and humanitarian considerations.

Qs 8 to 9 – The 2025 plan and the levels beyond 2026

CAPIC believes the levels plans, though are present in numbers, are not solely about numbers but about a good strategy to administer immigration and achieve the objectives set out by Parliament in ss. 3(1) and (2) of IRPA.

To provide proper input on Qs 8 and 9, we carried out a study on the following factors based on statistics and research results available: (i) the impact of immigration admissions to Canada, (ii) the retention of permanent residents, (iii) the rate of permanent resident seeking citizenship, and (iv) the rate of Canadian expatriates.

The impact of immigration is threefold, reflecting economic, cultural, and social fronts. Though immigration has become a means to boost the economy, workforce supply, and population growth, we may want to explore what it has brought to Canadians bearing the objectives of IRPA in mind. We do not have an answer to this, but considering a question: "Is the standard of life of Canadians maintained?", probing the aspects below may point to the right direction for the planning:

- Are [Canadian jobs](#) extended to Canadians and permanent residents first?
- Has an effective mechanism been put in place to address the [housing affordability](#) issue?
- Do Canadians and permanent residents have difficulties putting [food](#) on their tables?
- Does Canada remain [safe](#) or has it become less [safe](#)?

- Is there an effective mechanism to safeguard the integrity of the Canadian immigration system so that the chance of admission of foreign nationals who are accomplices of unauthorized practitioners ([UAPs](#)) is low?

If the answers to the questions are mostly negative, then the questions that follow would be, “Can we address those issues effectively if the high levels of immigration are maintained and how?”

Coming to retention, we presume that admission of permanent residents is to receive them into the Canadian fabric, and thus retention through integration would work in tandem with admission. [Statistics](#) show around 10% of immigrants emigrated and around 10% of immigrants are considered returning emigrants. Because the methodology adopted for the statistics does not distinguish short return from stay, we do not know the accuracy rate of immigrant retention. [The Leaky Bucket: A Study of Immigrant Retention Trends in Canada](#) revealed a trend of decline in both medium-term and long-term retention rates, especially long-term. Without addressing the retention issue properly, maintaining high levels of immigration could be problematic.

Concerning pursuing citizenship by permanent residents, the [census data](#) shows a sharp decline from 75.4% in 1996 to 45.7% in 2021. It may be attributed to the impact of COVID-19. However, without the data in 2022 and 2023, such a conclusion is not final.

Statistics and [studies](#) seem to indicate an increase in the number of Canadian expatriates. In 2016, it is estimated that [4 million](#) Canadians lived abroad. According to the United Nations in 2017, around [1.3 million](#) Canadian-born Canadians lived abroad. Though the Government of Canada has data based on a [register](#) for Canadians to voluntarily register when going abroad, it does not distinguish travel from dwelling. Even though it is yet too early to draw a concrete conclusion that the trend of the Canadian diaspora is on the rise after the 2016 study, the sign of such a trend may present an idea: It may be worth considering balancing the retention of both Canadians and permanent residents and the admission of permanent residents.

Qs 10 and 11 – If increase in immigration level, which class to prioritize growth and if decrease, which class to decrease

Our research cannot conclude that the increase in immigration level would be favourable to Canada.

However, regardless of increase or decrease, we would suggest that family class admissions be prioritized and not be decreased. The rationale behind the

suggestion is twofold: First, family is the foundation of any community. Second, a Canadians-first approach keeps Canada as the nation of Canadians.

4. The important factors in supporting immigrants and communities in Canada

CAPIC has a national mandate, therefore, the input we provide for Qs 12 to 15 applies to all regions.

Q12 – Important investment factors

We would rank the most important contributing factors in the following order:

1. housing, and
2. healthcare services.

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 of living standards without being stressed by high housing costs and long waiting times for healthcare.

Affordable housing has been an issue across Canada for years. The trend of cost increase in either purchasing or renting a place to live persists. Most recent new condominium apartment [price indexes](#) reflecting the price for such in nine census metropolitan areas across Canada show the general trend of price increase remains, which uses 2017's price as a parameter. 2017 was the year that housing affordability was already a big issue. Both Canadians and newcomers need a roof over their heads, with or without an increase in immigration levels plan, more housing units are in demand.

The same applies to healthcare services. Long waiting times for medical treatment in Canada have become a norm, which should not be. 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 median waiting time in 2023 is 27.7 weeks, 195% longer than the 9.3 weeks in 1993. [2022](#) and 2021 were not much better than 2023, which were 27.4 weeks and 25.6 weeks respectively. The longer waiting time year by year shows the need to address this issue.

Q13 – 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.

Studies found that immigrants who are proficient in English earn significantly more than those who cannot converse in English. [Improving Settlement Services Across Canada](#), a study report released by the Standing Committee on Citizenship in June 2019 (the CIMM Settlement Services Report) pointed out that “[...]language 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?](#), a research report issued by the Policy Research Branch of IRCC. The CIMM Settlement Service 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 2020, remains the most current evaluation of the FCRP. The report 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). The same year in October, Parliament released a report, [Recognition of the Foreign Qualifications of Immigrants](#). That Parliament Report concluded that the improvement of the FCR is difficult but suggested that monitoring the pre-arrival assistance in foreign qualification recognition in place would help to direct future policies. Both reports are clear that the ongoing issue of FCR is yet to have an effective solution.

A wide range of government and community services is available to immigrants. The instructions are clear, and the services are generally easily accessible. [2023 Settlement Outcome Report](#) shows that 32% of the survey respondents who participated in this settlement-related survey conducted by IRCC were not aware of the free settlement services offered by IRCC (p.13); 61% of those who did not use such services reported that they did not need it. The former may be in a better position if they knew about the services. It is unclear if the latter was fully aware of what was offered in the services.

Q14 – Better attract and retain newcomers to rural or remote areas

The CIMM Settlement Services Report identified factors that affect rural immigration negatively: Lack of transportation and housing and lack of language services (pp. 44 to 45). Therefore, access to settlement services, especially language services, is the most important factor listed in the survey.

Other factors listed are all favourable admission policies for rural or remote communities. These measures may attract newcomers to these communities when seeking Canadian status and create a false impression of the feasibility of

the approach. However, without adequately addressing the issues identified in the CIMM Settlement Services Report, it would be hard for the communities to retain the landed newcomers. The Atlantic Immigration Pilot Program retention data given in [CIMM – Economic Immigration – November 29, 2022](#) seems to present good news: Over 90% of AIP applicants were still living in the region after 1 year, a much higher retention rate than other programs. If one examines the data from another perspective, it may point in the opposite direction. First, AIP is not a program for rural or remote areas. Second, provinces and territories have policies to attract newcomers to rural or remote areas. If AIP's outdid other programs in retention rate, we may want to know if the "other programs" include provincial and territorial programs aiming for rural or remote areas to see the picture of retention in such areas.

Q15 – Support increased Francophone immigration

To support increased Francophone immigration, increasing settlement and community services, including both English and French language training for French-speaking newcomers in Francophone minority communities is crucial. The [data](#) of population by first official language spoken and bilingualism, provinces and territories indicate the percentage of bilingual population across Canada is low. Quebec has the highest percentage at 46.4%. New Brunswick, being the only bilingual province prescribed in the Constitution, has a rate of 34%.

The increased Francophone policy stems from the legislated obligation of modernized *Official Languages Act*. Compared to retention, admission is easy. To integrate Francophone immigrants in both Francophone communities and Anglophone communities, offering free language training to Canadians and permanent residents in English-speaking regions could be a complement measure to settlement and community services extended to Francophone immigrants.

5. Permanent economic programs responding to economic and labour force needs.

Q16 – The extent the permanent economic immigration programs respond to economic needs across Canada

From the results of the employment of economic immigrants reflected in IRCC [research reports](#), especially the Economic Insights series that analyzes the two-step immigration selection, we may see that economic programs seem to respond to one aspect of economic needs: The labour force. In other words, it

may have responded to some Canadian employers' needs. The above-mentioned series focus on the factors that affect the admission of economic immigrants and the income levels of immigrants.

It is worth mentioning that economic needs are multifaceted. Labour force reflection is important. It is still one facet among all other factors, e.g., [housing affordability](#), [inflation rate](#), [foreign exchange rate](#), [tax](#), and so on. Collectively, the factors point out the answer to this query. With caution, our input on this front is neutral.

Q17 – The extent for permanent economic immigration programs focuses on selecting people with skills and/or work experience acquired in Canada

To obtain skills and/or work experience in Canada, foreign nationals, generally, are required to hold a study permit or work permit or are authorized to study without a study permit or work without a work permit. Those foreign nationals are either international students or temporary foreign workers.

[The International students as a source of labour supply: A summary of recent trends](#), a report of the series of International students as a source of labour supply, shows that the number of international students grew from 2000 to 2021 from a little more than 100,000 to 621,600 as of December 31, 2021. Over the 2000 to 2019 period, the percentage of economic principal applicants with Canadian study experience rose from 6% to 38%.

Based on the *Two-step Immigration Selection: [An Analysis of its Expansion in Canada](#)*, one of the Economic Insights series reports, In 2000, 8% of economic immigrants had pre-landing Canadian work experience, which increased to 46% in 2018. Over the 2000 to 2018 period, foreign nationals in Canada who held valid work permits as of December 31, rose roughly from 60,000 to 429,300.

The steady increase in permanent resident admissions of international students and temporary foreign workers may be partially attributed to the fact of exponential increase in numbers of these two groups.

While it would be easier to retain foreign nationals who have obtained skills and/or work experience in Canada, temporary residence programs and permanent residence programs are discrete in nature as per IRPA. When favouring these foreign nationals, a balance may need to be struck to avoid the false impression that coming to Canada is to stay. Blurring the line between the temporary resident programs and permanent resident programs could unintentionally encourage overstay, which is already an [issue](#) that plagues the Canadian immigration system.

Q18 – The extent for permanent economic immigration programs supports sectors with high demand for occupations that require a high school diploma or no formal education

CAPIC remains neutral concerning the support for lowering the educational threshold that may be brought forth if setting the extent at a high level. The rationale is twofold.

First, the IRCC study, [Occupational Outcomes of Immigrants: Lower Versus Higher Skilled Jobs](#), was triggered by labour market conditions, including increased difficulties filling jobs in some industries and occupations. It may be a good reference when considering this question. The study presents such a finding: The immigration system currently represents a significant share of lower-skilled labour in Canada, more than half of it currently coming through the economic class (p.5). Almost one-half of the lower-skilled jobs held by immigrants were accounted for by those with a postsecondary education (p.31). Because of this finding, we may conclude with caution that the high-demand occupations may be filled by immigrants with formal educations in their early landing years.

Second, the study also presents a question worth investigating. If many high-skilled immigrants obtain low-skilled jobs, what would happen to these foreign nationals who possess limited education levels or no formal education?

Q19 – The means federal selection contributes to regional economic growth, complementing existing provincial and territorial immigration efforts.

Among the mechanisms listed for this initiative, we would select two as the important contributing factors with some alteration for the first: Increase collaboration between all levels of government on regular immigration programs, and allow provinces, territories and municipalities to select more applicants through economic immigration programs.

We suggest collaboration between all levels of government on ALL regular immigration programs, namely three permanent resident classes prescribed in s. 12 of IRPA and three temporary resident classes. The reason behind this is that newcomers, either temporary or permanent, are received by provinces, territories and municipalities. These two levels of government understand their regional economy, including the regional labour market, and their capacity to receive and integrate newcomers. Family class and refugee class admissions are solely in the federal government's jurisdiction. However, these foreign nationals once landed, inevitably have a part to play concerning the regional economy. This applies to temporary residents. How well newcomers do and how well they are received by provinces, territories and municipalities are intertwined with each other and collectively impact the regions, including its economy.

6. The impact of temporary residents

Q20 – The level of temporary resident proportion of 5%

CAPIC supposes that the 5% proportion refers to international students, temporary foreign workers, and foreign nationals admitted on humanitarian grounds as temporary residents based on Minister Miller's [announcement](#) related to temporary residents. If we understood it correctly, such a proportion could be an ambitious levels plan that is not easily managed based on the patterns that occurred in the past few years. Examples include the exponential increase in international students that ends up with a [cap](#) on admission to this group, the reinstatement of temporary resident visa for some Mexican citizens as a response to the rise in asylum claims made by Mexican citizens that are unsuccessful, the [rising](#) number of refugee claims, and so on.

Q21 – Potential to improve equitable access to permanent residence opportunities

Jurisprudence is clear on this point: To foreign nationals, being selected for permanent residence or authorized temporary entry is a privilege, not a right. Therefore, the point may not be equitable access to opportunities for permanent residence, but the equitable treatment of applicants in processing. Following the requirements of procedural fairness should be adequate to address this matter.

7. Qs 22 to 26 – Input on the process of IRCC's engagement with stakeholders on the immigration levels plan

Given the mandate of CAPIC, being the voice of immigration and citizenship consultants who work in the frontline of the Canadian immigration arena, the most effective ways for IRCC to engage with CAPIC include email, written submissions, group discussions and meetings, and hybrid events.

This survey is a good approach to engaging the general public.

CAPIC would suggest monitoring the input to see the participation rate of the survey. If the rate is low according to the adult proportion of the population of Canada, a mechanism to encourage participation may be considered.

CAPIC has been actively participating in this and similar activities and will continue to participate. Our participation will still be in the form of a submission that allows us to contribute more.

CAPIC thanks IRCC for engaging CAPIC regularly. We will continue to support and participate in IRCC's engagement initiatives. CAPIC's expertise resides in immigration, refugee protection, and citizenship, with a focus on immigration and citizenship. Therefore, for all the listed topics in Q26, CAPIC is willing and able to participate in engagement initiatives other than the advancement of reconciliation if it is not related to immigration, refugee protection, and citizenship.

Recommendations

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

1. Full-scale analysis: Planning the immigration levels based on a full-scale analysis of its impact on Canada economically, socially, and culturally.
2. Permanent resident retention and integration: Implement measures to retain landed immigrants and provide more support for their integration.
3. Francophone immigration facilitation: Extend free French language training programs to Canadians and permanent residents in English-speaking regions to facilitate Francophone immigration.
4. Rural and remote areas development: Consider incorporating regional connections as an Express Entry CRS factor to bring immigration benefits to rural and remote areas, e.g., setting a minimum of time living in the intended community as a pre-requisite and continuation of residing in that community during processing as a mandatory requirement.
5. Regional selection expansion: Based on collaboration between the three levels of government, complement existing regional immigration efforts.

Conclusion

The survey is a good way to engage the general public on immigration levels planning. As CAPIC is a recognized leader and voice in the Canadian immigration consulting sector, active engagement in various forms with CAPIC can assist in bringing forth solutions and addressing difficulties caused by the complexities of immigration.

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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.