



CAPIC's Submission Regarding the 2025 Consultations on Immigration Levels

August 15, 2025

Table of Contents

Answers to questions in the online survey on immigration levels.....	4
Qs 1 to 10 – Answers to demographic questions.....	4
Q11 The most important areas of focus for Canada’s immigration system	5
Qs 12 and 14 The admission plans for temporary residents in the 2025-2027 Immigration Levels Plan for 2026 and 2027, and beyond 2027	6
Qs 15 to 17 The 2025-2027 Immigration Levels Plan for permanent residents for 2026 and 2027, and beyond 2027	8
Manageability and sustainability	8
Permanent resident retention	9
Naturalization rate	10
Diasporic demographics	10
Q18 Immigration class to be prioritized for growth if permanent residents were to increase	11
Q19 The category of temporary residents to be prioritized for growth if temporary residents were to increase.....	12
Q20 Immigration class to be decreased if permanent residents were to decrease.....	12
Q21 The category of temporary residents to be decreased if temporary residents were to decrease	14
Q22 To what extent should federal permanent economic immigration programs select workers to support key sectors of the economy with longstanding labour needs in occupation that require a high school diploma or no formal education	14
Q23 Importance of investment in certain areas.....	15
Q24 Most useful aspects to newcomers that would best support immigration	16
Q25 Anything else that would require investment to support immigration in a particular region.....	17
Q26 Most useful aspects to support increased Francophone immigration in regions outside Quebec	18
Q27 Other factors to prioritize to support increased Francophone immigration in a particular region.....	18
Q28 Potential to improve equitable access to opportunities for those who wish to come to Canada.....	18



Q29 Most effective ways for IRCC to engage with CAPIC on immigration levels planning	19
Recommendations	19
Conclusion	19
Contact Us.....	20



CAPIC's Submission Regarding the 2025 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 2025 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 10 – 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 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. Immigration and citizenship consultants are authorized by [s. 91\(2\)\(c\)](#) of the *Immigration and Refugee Protection Act*, SC 2001, c. 27 (IRPA) to practice Canadian immigration law.

CAPIC advocates for competency, ethical conduct, and consumer protection in the immigration consulting industry by serving its 4,000 members, including Regulated Canadian Immigration Consultants (RCICs) and Regulated International Students Immigration Advisors (RISIAs). The association offers continuing professional education events and practice resources to help members maintain competency, develop new skills, and connect with fellow members. CAPIC services are provided to members in English and French. CAPIC's membership consists of authorized representatives who are Canadian citizens or permanent residents. Its members are located both within Canada and internationally, serving communities in urban and rural areas.

Q11 The most important areas of focus for Canada's immigration system

For the items listed in this question, and considering the current Canadian immigration context with a forward-looking perspective, CAPIC proposes the following prioritized order of importance, with a slight modification to the first item:

1. Help address economic and labour force needs and retain talents admitted to Canada;
2. Reunite families;
3. Sustain and strengthen communities in all regions across Canada;
4. Support the development of Francophone minority communities; and
5. Support humanitarian commitments.

The reasoning behind the prioritization is outlined below:

Firstly, IRPA forms the foundation of Canada's immigration system, aiming to maximize social, cultural, and economic benefits as outlined in [s. 3](#) (1). A strong labour force is essential for economic growth, making talent retention crucial. Since economic class programs favour skilled foreign nationals, it's important to retain immigrants with in-demand skills. Studies show these individuals are most likely to leave Canada if they have global opportunities.¹ Admitting new skills is valuable, but losing permanent residents undermines these efforts.

Secondly, the reunification of families in Canada is mandated under [s. 3](#) (1)(d) of IRPA. Families serve as foundational components of society, and data from *The Daily*, Statistics Canada's official release bulletin, indicate that Canadians reporting high satisfaction with family relationships are more likely to experience enhanced overall well-being.² The Evaluation of the Family Reunification (the Report) demonstrates considerable demand for spousal and parent/grandparent reunification pathways.³ Despite this, planned admissions for the family class between 2025 and 2027 represent the largest reduction among the three permanent resident categories.⁴ Although the family class may be perceived as less economically contributive, findings from the Report highlight substantial

¹ The Conference Board of Canada, "The Leaky Bucket 2024 – A Closer Look at Immigrant Onward Migration in Canada," released November 19, 2024, [online](#). Also see its same study report of [2023](#).

² Statistics Canada, "Being satisfied with family relationships is related to positive well-being, 2024," released February 19, 2025, [online](#).

³ IRCC, "Evaluation of the Family Reunification Program," modified July 23, 2024, [online](#), Finding 12.

⁴ IRCC, "Notice-Supplementary Information for the 2025 -2027 Immigration Levels Plan," 2025-2027 Immigration Levels Plan, modified October 24, 2024, [online](#).

benefits provided by this category to Canada's economy, cultural landscape, and newcomer retention, alongside its importance in facilitating family reunification.

The third item is listed in [s. 3 \(1\)\(c\)](#) of IRPA. The fourth item falls under [s. 3 \(1\)\(b.1\)](#), which addresses support for both Francophone and Anglophone minority language communities in Canada. Thus, [s. 3 \(1\)\(b.1\)](#) requires assistance to both groups.

Humanitarian commitment is rooted in Canada's international obligations for refugee protection and its humanitarian traditions, as outlined in ss. 3 (2)(b), (c), and (e) of IRPA. The IRPA provides a framework that aims to balance refugee protection with system integrity, public health and safety, and the security of Canadian society. Additionally, a stable economy and sustainable communities support Canada in meeting its international obligations and maintaining its humanitarian practices.

Qs 12 and 14 The admission plans for temporary residents in the 2025-2027 Immigration Levels Plan for 2026 and 2027, and beyond 2027

Limiting temporary residents to 5% of Canada's population assumes they will either become permanent residents or leave the country. Assessing this assumption is essential for evaluating the Plan. CAPIC invites IRCC to review the data on foreign nationals in Canada.

Firstly, the Statistics Canada data show:

- As of November 20, 2024, 2.2 million students were enrolled in Canadian colleges and universities.⁵
- As of November 27, 2024, 845,000 temporary foreign workers were present in Canada.⁶
- As of January 1, 2025, the number of non-permanent residents in Canada was 2,959,825.⁷
- The permanent residency transition rates vary between different types of work permit holders. Close to 50% of post-graduation work permit holders made the transition, which holds the highest transition rate.⁸

⁵ Statistics Canada, "Canadian postsecondary enrolments and graduates, 2022/2023," released November 20, 2024, [online](#).

⁶ Statistics Canada, "Research to Insights: Temporary Foreign Workers in Canada," modified November 28, 2024, [online](#), Large increase in numbers of temporary foreign workers, especially in recent years.

⁷ Statistics Canada, "Canada's population estimates, fourth quarter 2024," released June 18, 2025, [online](#).

⁸ *Supra*, note 6, Large variation in transition rates and pathways to permanent residency by type of work permit holder.

Secondly, CAPIC recommends that IRCC evaluate whether the volume of refugee claimants should be included as a necessary factor in this assessment. Data from the Immigration and Refugee Board (IRB) indicate that, as of March 31, 2025, there are 280,825 pending refugee claims.⁹ This figure does not encompass IRCC's asylum claim data for 2025, which shows 39,445 claims as of the end of April.¹⁰ Altogether, the total number of asylum claimants, protected persons, and related groups stands at 470,029 as of the second quarter of 2025.¹¹

Although refugee claimants are not classified as temporary residents under ss. [202](#) and [218](#) of the *Immigration and Refugee Protection Regulations*, SOR/2002-227 (IRPR), they are permitted to remain in Canada while their claims are processed. During this period, they may apply for work permits and study permits pursuant to ss. [206](#) (1)(a) and 215 (1)(d) of IRPR. Of these individuals, 313,441 hold a work permit, 131,221 possess a study permit, and 23,010 have both permits.¹²

Furthermore, failed refugee claimants do not always leave Canada voluntarily. As referenced in [Report 1 – Immigration Removal](#) from the 2020 Spring Reports of the Auditor General of Canada to Parliament, during the 2018-19 fiscal year, the Canada Border Services Agency (CBSA) maintained a wanted inventory of 24,100 failed refugees and a working inventory of 10,700.¹³ The most recent CBSA data, as of May 15, 2025, report that of the 30,797 cases in its removals-in-progress inventory, 28,248 involve refugee claimants.¹⁴

Third, data indicates that a large number of temporary residents, 766,000 with study permits and 519,400 with work permits, will see their permits expire by the end of 2025,¹⁵ and most lack a path to permanent residency.¹⁶ Despite recent reforms, the temporary resident population has more than doubled since 2021.¹⁷

⁹ IRB, "Claims by Country of Alleged Persecution – 2025," modified May 23, 2025, [online](#).

¹⁰ *Supra*, note 7.

¹¹ *Supra*, note 7.

¹² *Supra*, note 7.

¹³ See, "Exhibit 1.2—The Canada Border Services Agency faced a persistent accumulation of enforceable removal orders."

¹⁴ CBSA, "Canada Border Services Agency removals program statistics," modified July 16, 2025, [online](#), Table 6.2: Removal in progress inventory - Inadmissibility types.

¹⁵ National Post, "Immigration minister says temporary migrants will leave 'voluntarily'," [online](#), Nov.29, 2024.

¹⁶ Steven, Meurrens, "IRCC chart on work permit holders who permits were/are set to expire in 2024 or 2025, and who do not have a pathway to permanent residency," posted March 8, 2025, [online](#).

¹⁷ Parisa Mahboubi, "Why have a target for cutting temporary immigration if Canada can't meet it?" C. D. Howe Institute, posted July 3, 2025, [online](#).



Data from various sources indicates that many temporary residents have overstayed in Canada, with estimates of undocumented foreign nationals ranging from 300,000 to 500,000.¹⁸ CAPIC recommends considering this factor when planning admission levels for temporary residents.

Overall, CAPIC considers the inclusion of temporary residents' admission in the Immigration Levels Plan to be a constructive development. We recommend that the admission numbers be determined through a comprehensive analysis of Canada's capacity and the broader landscape of temporary resident admissions, taking into account data and factors of both the existing foreign national population in Canada and prospective applicants.

Qs 15 to 17 The 2025-2027 Immigration Levels Plan for permanent residents for 2026 and 2027, and beyond 2027

CAPIC suggests IRCC consider manageability, sustainability, permanent resident retention, naturalization rate, and diasporic demographics when evaluating admissions plans. This approach aims to create an objective framework for permanent resident admissions aligned with the objectives of IRPA.

Manageability and sustainability

According to the latest IRCC data, the backlog for permanent resident application processing stands at 415,800, which is higher than the backlogs for temporary residence (379,600) and citizenship (47,400); over 38% of applications are currently in backlog.¹⁹ The current number of permanent residence applications in backlog exceeds that of 2020 (375,137) but is slightly below the level seen in 2021 (525,570), when the pandemic significantly contributed to the accumulation.²⁰ Earlier this year, IRCC announced plans to reduce its workforce by more than 3,000 jobs.²¹ Additionally, spending is forecasted to decrease by 30% by 2028 compared to the 2025 fiscal year, including a reduction of over 10 percent in IRCC employees.²² In light of these factors, CAPIC recommends that IRCC evaluate the planned application volume to mitigate further backlog growth.

¹⁸ CBC, "Canadians — and Liberals — split on giving the undocumented status: immigration minister," [online](#), updated June 15, 2024.

¹⁹ IRCC, "IRCC applications at a glance: Inventories and backlogs," modified July 23, 2025.

²⁰ Laura Schemitsch, "No more excuses for our immigration backlog," the Canadian Bar Association, posted February 4, 2022, [online](#).

²¹ Catherine Morrison, "Federal immigration department to cut more than 3,300 jobs over three years," The Canadian Press, published January 20, 2025, [online](#).

²² Marlo Glass, "IRCC forecasts 30 per cent spending cut by 2028 amid lower immigration targets," *The Hill Times*, July 28, 2025, at p.17.

Research indicates that immigration does not resolve Canada's labour shortages or demographic challenges. According to the C.D. Howe Institute's analysis of policies from 2016 to 2024, increasing immigration may actually widen labour shortages,²³ as only about one in five new immigrants enters the workforce. Population growth is also outpacing Canada's support capacity,²⁴ reinforcing broader concerns below for Canadians.

- Housing remains unaffordable for many Canadians.²⁵
- The medical wait time for referrals from general practitioners to specialists has increased over the years, reaching its highest level in 2024.²⁶

A timely, transparent, and accountable immigration system is vital for attracting foreign talent to Canada. Equally important are support systems that ensure affordable housing and accessible healthcare. Assessing both IRCC's operational capacity and communities' capacity for integration is necessary.

Permanent resident retention

IRPA requires permanent residents to spend at least 730 days in Canada every five years or maintain strong ties to the country.²⁷ The residency obligation requires permanent residents to mainly live in Canada, supporting IRPA's goals. Retention rate measures how well permanent residents integrate; high rates show successful integration, while low rates highlight areas needing improvement.

Statistics Canada reported five-year retention rates from 2012 to 2016, ranging from 30.9% in Prince Edward Island to 93.1% in Ontario.²⁸ A Conference Board of Canada report found that permanent resident departures from Canada gradually

²³ Pierre Fortin, "The Immigration Paradox: How an influx of Newcomers Has Led to Labour Shortages," C.D. Howe Institute, released February 25, 2025, "Study in Brief," [online](#).

²⁴ Daniel Hiebert, "Balancing Canada's Population Growth and Ageing Through Immigration Policy," C.D. Howe Institute, released May 1, 2025, [online](#).

²⁵ Kyle Dahms, Ethan Currie and Noah Black, "Affordability improves for a fifth consecutive quarter in Q1 2025," National Bank of Canada, Housing Affordability Monitor, released May 29, 2025, [online](#).

²⁶ Mackenzie Moir and Bacchus Barua, "Canada's median health-care wait time hits 30 weeks—longest ever recorded," Fraser Institute, released December 12, 2024, [online](#).

²⁷ IRPA, [s. 28](#).

²⁸ Statistics Canada, "Provincial variation in the retention rates of immigrants, 2022," released February 14, 2024, [online](#).



increased, with sharp rises in 2017 and 2019.²⁹ A subsequent report predicted that 18% of permanent residents would leave within 25 years.³⁰

Measures to boost retention rates can complement permanent resident admissions.

Naturalization rate

Naturalization is the process by which a permanent resident obtains Canadian citizenship. For many immigrants, acquiring citizenship has been a common objective. In recent years, however, the naturalization rate in Canada has decreased. Although there was a high number of permanent resident admissions in 2021,³¹ the naturalization rate declined from 75.4% in 1996 to 45.7% in 2021.³²

Canadian citizenship requirements became less strict after October 11, 2017. The physical presence period was reduced from 1460 to 1095 days, and language and knowledge testing are no longer required for applicants aged 55 and up, down from 65.³³ Despite efforts to ease naturalization, the decline continued.

Examining why the naturalization rate has declined could help improve permanent resident admission plans.

Diasporic demographics

In 2016, about 4 million Canadians lived abroad.³⁴ Of these individuals, approximately 1.3 million were born in Canada.³⁵ A McGill study shows that one of the motivations for the Canadian diaspora is “especially prevalent among

²⁹ Institute for Canadian Citizenship, “The Leaky Bucket: A Study of Immigrant Retention Trends in Canada,” released October 31, 2023, [online](#).

³⁰ Institute for Canadian Citizenship, “The Leaky Bucket 2024: A closer Look at Immigrant Onward Migration in Canada,” released November 19, 2024, [online](#).

³¹ IRCC, “2022 Annual Report to Parliament on Immigration,” modified February 5, 2025, [online](#), p.5.

³² 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](#).

³³ See both versions of s. 5 of the *Citizenship Act*, RSC 1985, c. C-29 from [2017-06-19 to 2017-10-10](#) and from [2017-10-11 to 2024-08-18](#).

³⁴ Statistics Canada, “Study: The Canadian diaspora: Estimating the number of Canadian citizens who live abroad,” released April 13, 2022, [online](#).

³⁵ *Ibid*.



young, well-educated Canadians,”³⁶ the group that Canada prefers to retain, is increasingly willing to leave the country for better economic opportunities.

When a significant proportion of the diaspora comprises Canadian citizens seeking enhanced employment prospects abroad, it becomes important to consider strategies that balance the retention of both Canadian citizens and permanent residents during the planning of permanent resident admissions, including these factors.

Q18 Immigration class to be prioritized for growth if permanent residents were to increase

Our research cannot conclude that higher immigration levels benefit Canada unless current issues are resolved. We recommend the following actions from a forward-looking standpoint:

First, prioritize economic class immigration based on candidates’ human capital. Exercise caution with arranged employment due to its susceptibility to fraud,³⁷ which led to the removal of related points in Express Entry.³⁸ Such issues extend beyond Express Entry-administered programs. Consider giving more favorable treatment to Canadian work experience obtained by open work permit holders, for example, PGWP holders. A PGWP holder with over two years of Canadian work experience is a positive indicator that they have integrated into the Canadian economy.

Among the economic class immigration, CAPIC suggests investigating the impact of a 50 percent reduction of provincial nominee programs (PNPs). The PNPs have consistently demonstrated their value as one of Canada’s most effective immigration pathways. It enables provinces to select candidates who meet local labour market needs, support key industries, and strengthen community retention by aligning immigration with regional priorities.

The decrease in PNP allocations shifts demand to other immigration streams that may not address specific regional needs. This contributes to further population concentration in already high-growth urban centres, adding pressure to housing, infrastructure, and public services.

³⁶ Lucia Lovackova, “Canadians Abroad: Overview of Recent Research and Implications for Public Policy,” accessed August 15, 2025, [online](#), p.22.

³⁷ IRCC, “Canada takes action to reduce fraud in Express Entry system,” announced December 23, 2024, [online](#).

³⁸ IRCC, “Ministerial Instructions respecting the Express Entry system – current,” modified March 25, 2025, [online](#).



Second, family class admissions should be prioritized or at least maintained, as families are central to communities. A Canadian-first approach ensures that Canadians do not wait long to reunite with family.

Q19 The category of temporary residents to be prioritized for growth if temporary residents were to increase

Our research cannot confirm that more temporary residents would benefit Canada, as effective solutions to the following issues are currently unknown:

- Over 1.2 million temporary residents whose permits will expire in 2025.³⁹
- Of the 470,029 refugee claimants, protected persons, and related groups in Canada, 313,441 hold a work permit.⁴⁰
- About 300,000 to 500,000 foreign nationals are in Canada in violation of IRPA.⁴¹

However, Canada faces uncertainties in economic growth amid the tariffs imposed by the United States, the most important international trade partner that Canada has been relying upon for years.⁴² In light of this, Canada should have a plan to attract investors and entrepreneurs. The country's business immigration is in stagnation with both the reduced intake for the Start-up Visa and the pause of the Self-employed Person.

CAPIC invites IRCC to review business immigration plans (BIPs) developed by its members, who specialize in business immigration.⁴³ The BIPs propose programs for a limited number of foreign nationals that could contribute capital and entrepreneurial skills to Canada.

Q20 Immigration class to be decreased if permanent residents were to decrease

CAPIC suggests that the class of Refugees, protected persons, and persons in Canada on humanitarian grounds be decreased.

CAPIC supports Canada's humanitarian values but recommends that the nation assess its challenges to maintain both compassion and system integrity.

³⁹ *Supra*, notes 15 and 16.

⁴⁰ *Supra*, note 7.

⁴¹ *Supra*, note 18.

⁴² Statistics Canada, "The International Trade Explorer, 2023," Updated August 5, 2025, [online](#).

⁴³ CAPIC, "CAPIC's Recommendations for Redesigning Business Immigration Programs," posted April 17, 2025, [online](#).

CAPIC lacks sufficient data on capacity, but the following may offer insight:

- Canadian general government net debt was \$597.4 billion in Q1 2025.⁴⁴
- The average cost associated with a claimant possessing an eTA is projected to be \$16,500. The estimated expense for the inventory of claimants with an eTA before January 1, 2024, is \$455 million.⁴⁵
- The average cost for claimants needing a temporary resident visa (TRV) is uncertain but likely higher than for eTA holders, who make up most claimants. For example, between February 2023 and February 2024, housing around 5,000 claimants in Niagara Falls hotels cost about \$115 million, roughly \$208 per person per day.⁴⁶
- As of Q2 2025, there are 470,029 asylum claimants, protected persons, and related groups.⁴⁷

Meanwhile, the data indicate that Canadians are struggling. In March 2024, Food Banks Canada saw a record 2 million visitors; 18% relied mainly on employment income, and nearly 70% lived in market-rent housing.⁴⁸ Consumer and business insolvencies are increasing in 2025.⁴⁹

Given the rapid rise in refugee claims, one must ask: Has seeking asylum become another route to Canadian permanent residence? To be eligible to claim refugee protection does not require claimants to provide proof that they fit the description of either s. 96 or s. 97 of IRPA. Once they have passed the eligibility stage, they may apply for a work permit⁵⁰ and a study permit,⁵¹ and they are also covered by interim health care.⁵² Without a process to filter false refugee claims, Canada's system can be exploited by those seeking to misuse it.⁵³ Bogus claims delay legitimate ones, forcing real claimants to wait years for processing.

Compassion must be balanced with Canada's available resources. Furthermore, it is essential to address the loopholes in the system.

⁴⁴ Statistics Canada, "Government finance statistics, first quarter 2025," released June 27, 2025, [online](#).

⁴⁵ Lisa Barkova, "Costing Asylum Claims from Visa-Exempt Countries," Office of the Parliamentary Budget Officer, published May 31, 2024, [online](#).

⁴⁶ Touria Izri, "Housing asylum seekers at Niagara hotels cost Canada more than \$100 million," Global News, updated March 27, 2024, [online](#).

⁴⁷ *Supra*, note 11.

⁴⁸ Food Banks Canada, "Overall findings," accessed August 7, 2025, [online](#).

⁴⁹ Office of the Superintendent of Bankruptcy, "Insolvency Statistics in Canada – January 2025," modified April 1, 2025, [online](#).

⁵⁰ IRPR, s. 206.

⁵¹ IRPR, s. 215(1)(d).

⁵² The Government of Canada, "Interim Federal Health Program," modified July 22, 2025, [online](#).

⁵³ Madeline Weld, "Canada's Immigration System: An Invitation to Scammers," posted August 27, 2024, [online](#).



Q21 The category of temporary residents to be decreased if temporary residents were to decrease

CAPIC recommends reducing foreign worker admissions for two reasons.

Data indicates that students have the highest transition rate from temporary to permanent residency.⁵⁴

Currently, Canada has an abundant foreign labour supply from sources like international students and refugee claimants. Eligible international students may work unlimited hours on campus and up to 24 hours weekly off campus.⁵⁵ Among the refugee claimants and the like, 313,441 hold a work permit.⁵⁶ According to statistics, in 2021, permit holders for non-work purposes comprised 42% of temporary foreign workers, with the majority being international students.⁵⁷

Third, many Canadian youth are finding it difficult to secure part-time employment, which should be considered before hiring more foreign workers.⁵⁸

CAPIC suggests a two-step business immigration process, starting with obtaining a work permit.⁵⁹ This method targets only a small group of wealthy foreign investors and entrepreneurs, so it will not cause foreign worker increase.

Q22 To what extent should federal permanent economic immigration programs select workers to support key sectors of the economy with longstanding labour needs in occupation that require a high school diploma or no formal education

CAPIC does not see a need for this initiative, as this labour supply fills jobs other than seasonal work in agriculture, typically pursued by underrepresented Canadians and permanent residents, such as youth and new immigrants. Youth unemployment has remained above 10% since 2014.⁶⁰ In addition, new

⁵⁴ *Supra*, note 8.

⁵⁵ IRPR, ss. 186(f) and (v)(iii).

⁵⁶ *Supra*, note 12.

⁵⁷ Statistics Canada, "Research to Insights: Temporary Foreign Workers in Canada," corrected November 28, 2024, [online](#), "Temporary foreign workers include work permit holders, study permit holders and asylum claimants who are engaged in work activity in Canada."

⁵⁸ David Crane, "Carney government has two duties to younger Canadians, and one is to offer real hope," *The Hill Times*, published August 11, 2025, p.16.

⁵⁹ *Supra*, note 43.

⁶⁰ Deloitte, "Failure to Launch: The Economic and Social Costs of Youth Unemployment and their Long-term Impacts," released November 2024, [online](#), p.8.



immigrants face job search challenges, and nearly half of lower-skilled immigrant jobs are filled by individuals with postsecondary education.⁶¹

Q23 Importance of investment in certain areas

CAPIC suggests investing in housing and health care as a way to help retain newcomers and address issues related to high housing costs and healthcare wait times in Canada.

Affordable housing remains a significant challenge in Canada, marked by increasing prices for both home ownership and rental accommodation. Elevated mortgage rates⁶² and ongoing economic uncertainties continue to affect Canadian households.⁶³ Affordability remains a concern as new construction slows.⁶⁴ This long-time unresolved issue has negatively affected Canadian household formation.⁶⁵

Healthcare services face similar issues. Long wait times for treatment, especially for specialists, are now common in Canada and negatively impact people's lives.⁶⁶ In 1993, the wait time was 9.3 weeks. Recent data shows a clear trend of increasing wait times over the past four years:

- 2021: 25.6 weeks⁶⁷
- 2022: 27.4 weeks⁶⁸
- 2023: 27.7 weeks⁶⁹
- 2024: 30 weeks⁷⁰

⁶¹ CAPIC, "CAPIC's Submission on IRPR Amendment Concerning DLIs," posted July 29, 2024, [online](#), p.8.

⁶² Lisa Rennie, "Canadian Mortgage Rate History," Loans Canada, updated January 29, 2025, [online](#).

⁶³ Sean Cooper, "How U.S. Tariffs Are Shaking Up Canadian Mortgage Rates and Real Estate," updated March 19, 2025, [online](#).

⁶⁴ CMHC, "Summer Update: 2025 Housing Market Outlook," posted July 24, 2025, [online](#).

⁶⁵ Sachi Wickramasinghe, "Canada's housing crisis is preventing millions from forming the households they want," posted March 27, 2025, [online](#).

⁶⁶ Statistics Canada, "Wait times to see a medical specialist in Canada, 2024," released July 29, 2025, [online](#).

⁶⁷ Mackenzie Moir and Bacchus Barus, "Canada's health-care wait times hit 25.6 weeks in 2023—longest ever recorded," Fraser Institute, posted December 15, 2021, [online](#).

⁶⁸ Mackenzie Moir and Bacchus Barus, "Canada's health-care wait times hit 27.4 weeks in 2023—longest ever recorded," Fraser Institute, posted December 7, 2022, [online](#).

⁶⁹ Mackenzie Moir and Bacchus Barus, "Canada's health-care wait times hit 27.7 weeks in 2023—longest ever recorded," Fraser Institute, posted December 7, 2023, [online](#).

⁷⁰ Mackenzie Moir and Bacchus Barus, "Canada's health-care wait times hit 30 weeks—longest ever recorded," Fraser Institute, posted December 12, 2024, [online](#).



Despite efforts by both federal⁷¹ and provincial governments to admit more physicians, doctor shortages persist.⁷²

Q24 Most useful aspects to newcomers that would best support immigration

CAPIC identifies the aspects most helpful to newcomers for supporting immigration as follows:

- language training,
- foreign credential recognition support, and
- help accessing government or community services.

For immigration, Canadian language test results are as crucial as work experience and outweigh education and age for predicting Express Entry applicants' initial earnings.⁷³ An IRCC study also indicates language as a key predictor of both short-and medium-term earnings.⁷⁴ A June 2019 CIMM report found that language skills are essential for successful community settlement and entering the workforce.⁷⁵ The report stated that limited language training capacity delays access for new immigrants, creating a barrier. Supporting language proficiency can help improve economic stability, which encourages immigrants to stay in Canada.

A recent Employment and Social Development Canada (ESDC) evaluation found that foreign credential recognition continues to be a problem due to misalignment between Canada's immigration system and provincially regulated professions.⁷⁶ A publication from Parliament noted that enhancing the FCR poses challenges and recommended observing pre-arrival support in foreign qualification recognition to inform future policy decisions.⁷⁷ FCR greatly

⁷¹ IRCC, "Easier access to permanent residence for physicians in Canada to help address doctor shortages," modified September 23, 2023, [online](#). This is one example to show the doctor-facilitating policies. Provinces generally have a stream for health care professionals, access IRCC, "[Immigrate as a provincial nominee](#)" to check provinces' health care streams.

⁷² The Canadian Medical Association, "Why do Canadians wait so long for doctors' appointments?" accessed August 11, 2025, [online](#).

⁷³ Li Xu and Feng Hou, "Official language proficiency and immigrant labour market outcomes: Evidence from test-based multidimensional measures of language skills," Statistics Canada, released January 25, 2023, [online](#).

⁷⁴ Garnett Picot and Li Xu, "Which immigration selection factors best predict the earnings of economic principal applicants?" modified June 9, 2022, [online](#), p. 28.

⁷⁵ CIMM, 42nd Parliament, 1st Session, "Improving Settlement Services Across Canada," released June 2019, [online](#), p.18.

⁷⁶ ESDC, "Evaluation of the Foreign Credential Recognition Program," modified April 21, 2022, [online](#), p.9.

⁷⁷ Laurence Brosseau, "Recognition of the Foreign Qualifications of Immigrants," Parliamentary Information and Research Service, produced October 1, 2020, [online](#), p.7.



influences newcomers' employment prospects and its improvement is essential for supporting immigration.

CAPIC notes that various government and community services are clearly outlined and readily accessible to immigrants.⁷⁸ However, quite a few immigrants are unaware of the free settlement services offered by IRCC.⁷⁹ Immigrants who did not use such services reported that they did not need it.⁸⁰ Those in the first group might have settled better in Canada had they known about the services. The study did not address why the second group did not need the service, so it remains unclear whether the services should be adjusted to reach more people.

Q25 Anything else that would require investment to support immigration in a particular region

IRPA aims to promote a robust Canadian economy and ensure immigration benefits reach every region.⁸¹ CAPIC recommends a team-Canada approach to improve collaboration among all levels of government in rural and remote areas, ensuring these communities benefit from immigration.

Currently, 18.9% of Canada's population resides in rural areas, compared to 90% a century earlier.⁸² Metropolises often attract immigrants seeking economic opportunities, but these cities can also present challenges related to affordable housing and community support. Encouraging newcomers to consider settling in rural and remote areas may offer potential benefits for both immigrants and those regions.

Investment needs differ by region, requiring coordination among all three levels of government. The federal government has allocated \$35 million to boost resettlement in small towns and rural areas. Reviewing results of the allocation can help adjust future investments.⁸³ Strengthening the PNP may also support balanced regional development.

⁷⁸ CAPIC, "CAPIC's Submission on the 2024 Consultations on Immigration Levels," posted July 2, 2024, [online](#), p.9.

⁷⁹ IRCC, "2023 Settlement Outcomes Report: Data-driven Insights for the Future of the Settlement Program," modified May 14, 2025, [online](#), p.13.

⁸⁰ *Ibid*, p.14.

⁸¹ IRPA, [s. 3\(1\)\(c\)](#).

⁸² Wayne Caldwell, Pallak Arora, Brianne Labute, Natasha D'Souza Rea, Bakhtawar Khan, "Attracting and Retaining Newcomers in Rural Communities and Small Towns," accessed August 11, 2025, [online](#), p. 2.

⁸³ IRCC, "Government of Canada invests \$35 million to expand settlement services for newcomers in small towns and rural communities," modified July 8, 2024, [online](#).

Q26 Most useful aspects to support increased Francophone immigration in regions outside Quebec

The authority of the increased Francophone policy is the objectives of the *Official Languages Act*, RSC 1985, c. 31 (4th Supp.) (Official Languages Act).⁸⁴ Francophone immigration is facilitated through federal and provincial immigration policies. One example at the federal level is the category-based draw for French-speaking applicants.⁸⁵ Several provinces include options for Francophone candidates in their nominee programs as well.

Canadian Heritage data indicates that bilingualism rates in Canada are low.⁸⁶ Therefore, the main challenge is retaining them, particularly for integrating into English-speaking areas.

The Act supports both English and French linguistic minority communities equally.⁸⁷ Canada has 1,253,578 Anglophones in Quebec, outnumbering the 992,306 Francophones living outside Quebec.⁸⁸ Providing equal support for bilingualism among Anglophones in Quebec and French linguistic minority communities outside Quebec could serve as one approach to meeting the objectives of the Language Act.

Q27 Other factors to prioritize to support increased Francophone immigration in a particular region

CAPIC recommends that each region set its own supporting factors for the initiative, preferably based on the population's French proficiency.

Q28 Potential to improve equitable access to opportunities for those who wish to come to Canada

Equitable access for those wishing to immigrate to Canada is not an objective of IRPA. Canadians have the inherent right to enter and leave the country, while foreign nationals require authorization under IRPA. Admission of foreign nationals depends on the IRPA administration, not foreign nationals' preferences. CAPIC is unable to comment as the purpose of this question is unclear.

⁸⁴ The Official Language Act, ss. 2(a), (b.1) and (b.2).

⁸⁵ IRCC, "Express Entry: Category-based selection," modified July 10, 2025, [online](#).

⁸⁶ Canadian Heritage, "Official language minority communities with at least one school in the minority language," modified July 18, 2024, [online](#).

⁸⁷ *Supra*, note 84, s. 2(b).

⁸⁸ *Supra*, note 86.

Q29 Most effective ways for IRCC to engage with CAPIC on immigration levels planning

This survey is an effective way to engage the public. CAPIC suggests monitoring response rates and, if adult participation is low, implementing strategies to boost involvement.

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

Recommendations

Based on the factors and analysis above, CAPIC recommends:

1. Comprehensive analysis: Assess immigration levels with a focus on factors affecting Canadians' quality of life, such as housing, health care, education, and infrastructure.
2. Quality over quantity: Prioritize admission based on foreign nationals' human capital and potential contributions.
3. Revamp business immigration: Update programs to better attract investors and entrepreneurs.
1. PNP allocation restoration: Restore PNP allocation to pre-reduction levels, then work with provinces and territories to boost allocations for streams with high retention based on outcome studies.
4. Improve retention and integration: Collaborate with provinces and territories to support immigrants.
5. Enhance Francophone population: Use demographic data to determine if immigration is the most effective method for increasing bilingual populations.
6. Develop rural/remote areas: Foster government cooperation and incentives for settlement in such areas.
7. Address unauthorized practitioners (UAPs): Implement a broad crackdown to uphold the system's integrity.

Conclusion

Immigration affects Canada in social, cultural, and economic ways. Reviewing past experiences can help maintain a system that upholds integrity and transparency. CAPIC is a recognized leader and voice in the Canadian



immigration sector and is willing and happy to assist in bringing forth solutions to address the current immigration issues facing Canada.

Contact Us

www.capic.ca

Hui Zhang: Stakeholders@capic.ca