



Minister Sean Fraser, M.P.  
Minister of Justice and Attorney General of Canada  
Email: [mcu@justice.gc.ca](mailto:mcu@justice.gc.ca),

May 27, 2025

**RE: The Canadian Association of Professional Immigration Consultants (CAPIC) Congratulates Honourable Sean Fraser on Appointment as the Minister of Justice and Attorney General of Canada**

Dear Minister Fraser:

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), I would like to congratulate you on your appointment as Minister of Justice and Attorney General of Canada.

CAPIC appreciated your leadership when you were the Minister of Immigration, Refugees and Citizenship Canada (IRCC). With you at the helm of IRCC, CAPIC had the opportunities worked with you and your department by providing input for a variety of immigration matters and policy development.

I am glad that a work in progress, the amendments to the *Citizenship Regulations* and the *Immigration and Refugee Protection Regulations*, presents CAPIC with an opportunity to continue to work with you.

The above-mentioned amendments introduce an Administrative Penalties and Consequences (APC) regime that intend to crack down on unauthorized practitioners (UAPs) and hold bad actors among authorized representatives (ARs) accountable to safeguard the integrity of the Canadian immigration system.

CAPIC welcomes equal treatment to ARs in the proposed APC regime, which reflects and conforms to the legal principles of the *Constitution*. However, CAPIC also has noted that the APC regime treats three types of violations without distinction: UAP practice, AR miscounselling, and misrepresentation. Such an approach may lead to confusion and could ultimately undermine the effectiveness of the APC regime.

Herein, I enclose our submissions on the amendments to the two regulations for your consideration.

I look forward to a meeting with you in the coming weeks to discuss the optimal design for the APC regime that can support its intended objectives.

Once again, congratulations on your appointment, and I look forward to the opportunity to reconnect.

Sincerely,



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

Enclosures:

1. [CAPIC's Input for Regulations Amending the Citizenship Regulations \(Administrative Penalties and Consequences\)](#)
2. [CAPIC's Input for Regulations Amending the Immigration and Refugee Protection Regulations \(Administrative Penalties and Consequences\)](#)