

Filipino Post Box 2953, 349 West Georgia, Vancouver, BC V6B 3X4

December 1, 2017

RE: "Authorized Immigration Representatives and The Canadian Dream."

To Whom It May Concern:

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC), I would like to point out several misleading and/or inaccurate statements that were published in the above noted opinion piece in your newspaper on November 28, 2017.

Firstly, the author does not clarify whether the immigration consultants who are scamming clients are in fact regulated immigration consultants, who are accountable to a stringent code of ethics and a disciplinary process. Moreover the *New York Times* article references an alleged criminal who is not an immigration consultant as defined by the IRPA section 91. Additionally, the term "registered immigration consultants" is incorrect; the correct term is "Regulated Canadian Immigration Consultants (RCIC)," as per the IRCC website and the IRPA section 91.

The claim that "Training for immigration consultants is as little as a one year part-time (3 hours/week) course" is false. Individuals must take at least 500 hours of immigration law courses from an immigration practitioner program to qualify for the ICCRC's Full Skills Exam. Once licensed, RCICs must pursue at least 16 CPD hours of immigration and citizenship law.

The following claim is also false: "When allegations of misconduct are made against registered immigration consultants, a Board composed of ICCRC members is authorized to investigate and address the complaints." The ICCRC Board is not authorized to investigate or participate in the disciplinary or complaint process. Rather, independent committees (like those of Law Societies) are responsible for this. If the issue involves an unauthorized practitioner, moreover, it is not within the ICCRC's jurisdiction to take disciplinary action. Instead, that duty falls to the Canada Border Services Agency (CBSA), which has limited resources to pursue them.

The following sentence is misleading: "While these complaints target the actions of immigration consultants, the true victims are the immigration applicants who place their trust in an authorized representative's hands." The writer is implying that immigration consultants consider themselves victims. Similarly, the writer presumes that the same level of inaction witnessed by Steven Meurrens also occurred with complaints made by the public, though this is unproven.

As Canada's association of regulated immigration consultants, CAPIC has always been committed to promoting and protecting the integrity of this noble profession and the immigration system. Each profession is tarnished by the actions of unscrupulous individuals, but it remains imperative that good judgment and fair commentary be exercised whenever such cases are examined in the media.

Yours Truly,

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