



July 11, 2017

Mr. Chris Daw, Chairman  
The Immigration Consultants of Canada Regulatory Council (ICCRC)  
5500 North Service Rd., Suite 1002  
Burlington, ON  
L7L 6W6 Canada

By Email: Chris Daw <cdaw@iccrcc-crcic.ca>

CC Stephen Ashworth, President and CEO  
<sashworth@iccrcc-crcic.ca>

Dear Mr. Daw,

**RE: CIMM Study & Stakeholder Concerns Regarding the Immigration Consulting Profession - A Call for Action & Our Preliminary Position**

I am writing on behalf of the Board of Directors of the Canadian Association of Professional Immigration Consultants (CAPIC).

As you are aware, CAPIC represents the interests of ICCRC-Regulated Canadian Immigration Consultants (RCIC). Fostering the recognition of immigration consultants and our profession is one of CAPIC's four foundational pillars.

Throughout CAPIC's active campaign and during meetings with CIMM members and other major stakeholders pertaining to CIMM standing order 108(2) – to conduct a study concerning the legal, regulatory, and disciplinary frameworks governing and overseeing immigration, refugee, and citizenship consultants and paralegal practitioners in Canada – the Board was made aware of concerns that were eventually reflected in the Committee's June 14<sup>th</sup>, 2017 report, presented to Parliament on June 16<sup>th</sup>, 2017.

As an advocacy organization, we have lobbied stakeholders and supported the regulator both in the interest of RCIC as a whole and our members in particular, as well as the clients that RCIC serve. Among our main concerns are those contained within recommendations 3 through 6, namely matters of education and admission standards, graduated licensing and areas of specialization, and mechanisms for processing RCIC complaints and discipline, which are clearly outlined in the report. In addition to these, CAPIC strongly supports taking immediate action to increase IPP to a one-year diploma, with an appropriate internship, and then gradually to a bachelor's degree program; CPD requirements should be increased and include at least basic training in RCIC governance. CAPIC also supports many of the other recommendations, as they would enhance the ICCRC's regulatory effectiveness. One such recommendation is granting the ICCRC greater authority to deter unauthorized practitioners (UAP).

CAPIC strongly supports significant improvements in the coming months regarding outstanding issues and the strengthening and implementation of an effective, timely, and efficient complaints and discipline process. This is our call for action to the ICCRC.

CAPIC is pleased to note that the Committee has understood and agreed on the need for regulation under federal statute. However, we believe that the current infrastructure already in place at the ICCRC merely needs to evolve and transition into a statutory regulatory body, similar to that of other Canadian regulators, which would save tax payers millions of dollars without requiring a reinvention of the wheel.



The CAPIC Board seeks confirmation from the ICCRC that it supports the above recommendations, which will significantly strengthen consumer protection and underscore the important contributions of RCIC not only in bolstering the Canadian economy, by legally assisting qualified immigrants to make Canada their home, but also by reducing the administrative burden on the IRCC and ensuring that it operates more efficiently.

The CAPIC Board wishes to assure the regulator of its support, on condition that significant improvements are promptly made regarding the aforementioned matters and stakeholder concerns, especially those related to the complaints and discipline process. As a self-regulated profession, we need to assure the government and the public that we are capable and serious about policing ourselves. Should such improvements fail to materialize, CAPIC will be forced to reassess its support.

We thank you and look forward to more information on the matter.

A handwritten signature in blue ink, appearing to read 'DI'.

Donald Igbokwe, President  
Canadian Association of Professional Immigration Consultants (CAPIC)