



June 18, 2019

Mr. Raymond Kunze
Director General, Operations
Immigration, Refugees and Citizenship Canada
365 Laurier Avenue West
Ottawa ON K1A 1L1

Re: "Canada's visa information campaign in India"

Dear Mr. Kunze,

The [June 17 news release](#) of Canada's visa information campaign launch in India unfairly denigrates immigration consultants.

The second paragraph, which notes the dangers of using an "unauthorized immigration consultant," is especially misleading since it implies that the existence of criminals is exclusive to the immigration consulting profession. By contrast the commonly used term "unauthorized representative," which appears in IRPA and IRCC's communications, recognizes that criminal behaviour is not unique to a single practitioner group; [this IRCC webpage](#) frequently mentions representatives, not consultants. Incorrect terminology is detrimental to the spirit of Bill C-97, which holds immigration consultants accountable to the same standards as lawyers and other authorized representatives.

The campaign is also confusing because it fails to portray the profession accurately. Nowhere does it mention that immigration consultants are regulated, a small detail that would clearly distinguish between practitioners who abide by strict codes of professional conduct and criminals, who do not. Although the campaign aims to protect the consumer, it does so more by fear-mongering than by providing information on the benefits of using an authorized immigration consultant.

Given the irrevocable harm that such wording might cause to the profession's standing abroad, CAPIC requests that it be modified prior to the campaign's launch and, if already launched, that prompt amendments be made to more accurately reflect both the profession itself and the realities of using any representative for immigration-related services.

CAPIC has remained steadfast in its support of the regulation, under federal statute, of immigration consultants and fully supports awareness campaigns that promote equally the viability of all authorized immigration representatives. I trust that the above clarifications are helpful.

Yours truly,

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