Canadian Association of Professional Immigration Consultants

L'Association Canadienne des Conseillers Professionnels en Immigration

The Honourable Lena Metlege Diab
Minister of Immigration, Refugees and Citizenship
Email: minister@cic.gc.ca

October 26, 2026

Dear Minister Diab:

RE: The Suspicious Immigration Practice of Direct-to-Consumer Artificial Intelligence

On behalf of the Canadian Association of Professional Immigration Consultants (CAPIC) and the more than 4,000 Regulated Canadian Immigration Consultants (RCICs) and Regulated International Student Immigration Advisors (RISIAs) we represent, I write to bring to your attention a public-protection concern and to respectfully submit the enclosed recommendations. The concern relates to immigration services that use artificial intelligence (AI) to give applicants individualized immigration advice for a fee, without an authorized representative who is accountable for that advice.

Subsection 91(1) of the *Immigration and Refugee Protection Act,* SC 2001, c. 27 (IRPA) prohibits anyone other than an authorized representative from advising for consideration, directly or indirectly, and it makes no exception for advice delivered by software. Paragraph 77(c) of the *College of Immigration and Citizenship Consultants Act*, SC 2019, c. 29, s. 292 (College Act) contains a parallel prohibition.

What is missing is public confirmation that these provisions apply to AI services, together with enforcement. Regulators of securities advice in Canada and the Australian Government have already confirmed that the professional activity remains regulated whether delivered by a person or AI.

CAPIC therefore recommends the following:

- on the "Learn about representatives" web page, confirm that subsection 91(1) of IRPA and paragraph 77(c) of the College Act apply regardless of the technology used;
- extend existing enforcement measures against unauthorized practitioners to AI services by adding a question to application forms about AI assistance;
- extend existing consumer-awareness measures to AI services by posting AI UAP practice warnings on the Department's social media platforms;
- measure the problem by collecting relevant data and stakeholder consultations; and
- preserve the practice of authorized representatives in any future innovation framework by engaging industrial stakeholders in the framework development.

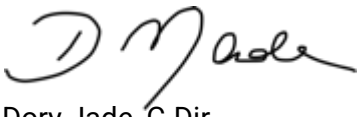
Each of these measures can proceed under existing statutory authority. CAPIC supports responsible innovation and open access to general immigration information but oppose any form of unauthorized practice.

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CAPIC would welcome the opportunity to meet with you or your officials to discuss the issue and is pleased to contribute a submission. CAPIC remains committed to protecting the integrity of Canada's immigration system.

Yours truly,



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

cc: Ted Gallivan, Deputy Minister, Immigration, Refugees and Citizenship Canada
Michael Huynh, President and CEO, College of Immigration and Citizenship Consultants