



Canadian Association of
Professional Immigration Consultants
L'Association Canadienne des
Conseillers Professionnels en Immigration

Northwest Territories Nominee Program

Email: immigration@gov.nt.ca

February 2, 2024

Re: Recommend replacing the name of ICCRC with CICC in the NTNP Use of Representative Forms and guides to reflect the legislative change and revising the wording in the business stream guide to reflect the letter and spirit of IRPA

Dear Ms. Dautel,

The Canadian Association of Professional Immigration Consultants (CAPIC) is the sole association recognized by the Government of Canada as the [voice](#) of RCICs and is committed to promoting the ethics and competence of our members and protecting the [integrity](#) of the RCIC profession and the Canadian immigration system.

CAPIC would like to bring to your attention the following two matters:

1. The use of the outdated name of the former designated organization, the Immigration Consultants of Canada Regulatory Council (ICCRC)

CAPIC believes you are fully aware of the [coming into force](#) of the [College of Immigration and Citizenship Consultants Act](#), S.C. 2019, c. 29, s. 292 (the College Act), which established the College of Immigration and Citizenship Consultants (CICC), the regulatory body for RCICs, as it is CICC in the NTNP application guides. CICC has since replaced the ICCRC.

However, ICCRC is still used in the NTNP forms of authorizing or cancelling a representative for [nominees](#) and [employers](#) respectively.

2. The wording used in your guides concerning the use of representatives in the NTNP business stream [guide](#)

On p. 7 of the above-mentioned guide, it states "Payment to an Immigration Representative who is not regulated as described above is strongly discouraged." Those actors are known as unauthorized practitioners (UAPs) who are the force that threatens the integrity of the Canadian immigration system. While CAPIC understands it is to show the disapproval of the NTNP for the use of UAPs and appreciates the good intentions of the NTNP, such expression could be confusing. Pursuant to [s. 91\(9\)](#) of the *Immigration and Refugee Protection Act*, S.C. 2001, c. 27 (IRPA), obtaining



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considerations in exchange for immigration advice/services without being authorized is **an offence** subject to a fine and/or imprisonment. Therefore, CAPIC recommends explicitly stating that UAP practice is an offence, which reflects the provision of IRPA more accurately and should be more effective in preventing immigration fraud.

CAPIC is willing and able to assist in immigration legislation, regulation, and policy development as well as program improvements. If we may further assist with the NTNP, we will be glad to work with you and your team.

Yours Truly,

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

c John Murray
President & CEO, Registrar, CICC