



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

The Honourable Marc Miller
Minister of Immigration, Refugee, and Citizenship
Ottawa, ON K1A 0A6
minister@cic.gc.ca

January 24, 2024

RE: Recommend adding immigration and citizenship consultants as occupation-based guarantors for passport and refugee travel document applications

Dear Minister Miller:

We at CAPIC write this letter to recommend adding immigration and citizenship consultants (RCICs), a legal profession established by the *College of Immigration and Citizenship Act*, S.C. 2019, c. 29, s. 292 (the [College Act](#)), as occupation-based guarantors for passport and refugee travel document applications.

Our recommendation is based on the following rationale:

First, the [occupations](#) on the list of occupation-based guarantors for the two applications are mostly registered/licensed occupations. RCIC is a federally regulated occupation pursuant to the College Act.

Second, RCICs are one of the three groups of authorized representatives prescribed in s. 91(2) of the *Immigration and Refugee Protection Act*, S.C. 2001, c. 27 ([IRPA](#)). The other two groups, Canadian lawyers, and Quebec notaries are listed on the occupation-based guarantors.

Third, in the situation where applicants of these two types of [applications](#) cannot find a guarantor, the alternative is to complete the Statutory Declaration in Lieu of Guarantor form, which is required to be signed before any of the three designated occupations. Commissioner for oaths is one among the three, and provinces recognize RCICs' eligibility to be appointed as a commissioner for oaths.



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Last, guarantors are to verify the identity of the applicants and certify the true likeness of the applicants on the photos submitted for the applications. This line of work is one of the essential parts of RCICs' practice.

The immigration and citizenship consulting profession, as enshrined in law, is a federally regulated profession and should enjoy the same treatment as the provincially regulated professions. CAPIC believes there is no reason to exclude members of this profession from being guarantors for the two applications, as all authorized representatives are given the same standing before the Department according to s. 91(2) of IRPA.

Your kind consideration is much appreciated.

Yours Truly,

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