



## **IRCC Consultation on Immigration Levels**

### **Written Submission from World Education Services**

**June 28, 2024**

#### About WES

World Education Services (WES) is a non-profit social enterprise dedicated to helping international students, immigrants, and refugees achieve their educational and career goals in Canada and the United States. For more than 45 years, WES has set the standard of excellence in the field of international academic credential evaluation. Through WES Global Talent Bridge, the organization joins with institutional partners, community-based organizations, and policy makers to help immigrants and refugees who hold international credentials fully utilize their talents and education to achieve their academic and professional goals. Its philanthropic arm, the WES Mariam Assefa Fund, supports catalytic leaders and organizations working to build inclusive economies and to ensure that immigrants and refugees can achieve their aspirations and thrive. Since 2013, WES has been a designated provider of Educational Credential Assessments (ECAs) for Immigration, Refugees and Citizenship Canada (IRCC).



WES is grateful for the opportunity to provide input as IRCC develops the Immigration Levels Plan that will be presented to Parliament this fall.

WES submitted a response to the online survey as part of the consultation. Because multiple choice and short form answers limit the ability to provide fulsome feedback, WES is supplementing our survey responses with this written submission to inform the Immigration Levels Plan.

## Levels Planning Exercise

Canada cannot achieve our objectives without a healthy immigration system. Our efforts to select and settle immigrants are investments in our own better future.

Yet immigration is increasingly being used as a wedge issue. Challenges relating to affordability, housing, healthcare, and infrastructure are top of mind for the public. At times, these challenges have been attributed to rising immigration admissions, leading to heightened xenophobia. It is therefore critical that immigration and settlement are informed by clear objectives and supported through coherence across multiple policy domains.

The exercise of articulating immigration levels provides predictability and stability for the wide range of actors who engage with Canada's immigration system. The plan should both reflect and inform policies across government. It can be used to develop system capacity to settle and support immigrants, including investments in infrastructure such as housing, transit, childcare, and settlement services. The inclusion of levels for temporary residents in the Immigration Levels Plan will allow for a more robust process of planning and operationalizing a cohesive immigration system.

In the subsequent sections, WES identifies factors that should be considered when setting levels and operationalizing the levels plans.



## Summary of Recommendations

1. Canada should maintain its commitment to economic, family, and humanitarian immigration.
  2. The level of refugee immigration should account for changes in the scale of displacement globally.
  3. Economic immigration should include a balance between high human capital applicants and immigrants who meet labour market needs in Canada. It should also account specific needs, for example the importance of francophone or bilingual immigrants in particular regions.
  4. Transition to permanent residence should account for a substantial portion of economic immigration programs in the near future. This should be coupled with a plan to reduce the number of temporary permits issued in future years.
  5. The Temporary Foreign Worker Program should be reserved for temporary vacancies. Its use to fill seasonal vacancies should be phased out.
- IRCC and Employment and Social Development Canada should collaborate to make Canada the best in the world at competency-based credential recognition for both licensed and non-licensed professions and trades.

## Permanent Immigration Levels

Canada's immigration program brings people through three streams – economic, family reunification, and humanitarian. Each stream meets a distinctive objective and is important in its own right. Canada should maintain its commitment to all three programs.

## Levels and Selection of Economic Immigrants

The level of economic immigration should be derived by considering the objectives and outcomes of each economic immigration program. With a substantial growth in the population of temporary residents, Canada should set economic immigration levels that can allow for a large volume of transitions to permanent residence.

There is a **persistent mismatch** between the occupations and skill levels needed by employers versus the occupations and skill levels of immigrants selected to immigrate to Canada. While higher human capital is necessary for most economic immigration programs, **RBC reported** that almost half of projected structural labour shortages are in occupations that don't require a university or college education. This mismatch leads to three negative outcomes:

1. A strain on employers who need workers
2. **Immigrant underemployment** and skill waste
3. Inflated demand to bring workers to Canada with temporary permits



Economic immigration should be divided amongst economic immigration programs in a way that balances between high human capital applicants and immigrants who meet labour market needs in Canada.

Canada's recent use of Category Based Selection (CBS) offers an opportunity to achieve a balance between human capital and labour market needs. But the program has not been complemented with an end-to-end plan to ensure that immigrants selected under CBS quickly find work commensurate to their education and experience. Many occupations prioritized for CBS are licensed occupations, meaning that immigrants may be delayed or prevented from actually working in the sector that badly needs their labour power. The current CBS runs the risk of expanding the pool of people in Canada who cannot work in their own profession without alleviating labour market shortages. Before pursuing CBS for licensed professions, Canada should ensure there are clear, fast, functioning pathways to licensure. WES has included further comments on economic inclusion of immigrants below.

Economic immigration levels should account for programs that meet specific needs, for example the importance of francophone or bilingual immigrants in particular regions.

WES applauds the [announcement](#) that Canada is expanding and aiming to make permanent Economic Mobility Pathways Pilot. This program allows Canada to further boost its commitment to humanitarian immigration while also meeting the need for workers in Canada.

There is a current urgent need for a dedicated pathway to permanent residence for the large number of temporary residents, many of whom have been in Canada for a long period of time. Transition to permanent residence should account for a substantial portion of economic immigration programs in the coming years. The size of these pathways can be recalibrated if/as the number of temporary residents declines, in line with our recommendations on temporary immigration (below).

## **Levels and Selection of Family and Humanitarian Immigrants**

While family and humanitarian immigrants are not (and should not be) selected for their economic impact, it is important to recognize the benefits that these immigrants bring to Canada, in the form of skills, labour power, creativity, and novel perspectives.

Family immigrants [unlock the potential](#) of people already in Canada, strengthening support networks and improving quality of life.



Globally, **displacement is on the rise**, creating a growing need for humanitarian immigration. But opportunities for refugees to come to Canada, whether through resettlement programs or the arrival of **self-resettled refugees** (refugee claimants), are **shrinking**. Canada should continue to live up to its reputation as a leader in humanitarian immigration.

## Temporary Immigration Levels

WES commends IRCC for the inclusion of targets for temporary residents in the Levels Plan. It facilitates greater program oversight, measuring the scale of temporary immigration against the plans. It also allows for planning across departments and levels of government, since actors can better anticipate short-term population change.

WES is calling for temporary immigration levels for 2025-2027 to be significantly lower than the number of permits issued in 2023. This can be achieved by shrinking each component of the temporary immigration system.

## Study Permits

The number and conditions of international students influence Canada's global reputation and the integrity of the immigration system, and therefore are of critical concern to IRCC. The levels set for study permits should take into account two factors: the capacity of educational institutions to provide a strong educational experience to those students; and the number of opportunities to transition to permanent residence (PR).

Opportunities to transition to PR is an important consideration because most international students choose to study in Canada with a desire to become permanent residents. The **2021 survey** of international students conducted by the Canadian Bureau of International Education revealed that only 8% of respondents had no intention of seeking PR in Canada.

Currently, many educational institutions are misusing international student recruitment to **increase revenue**, rather than admitting international students with a focus on a strong educational experience for domestic and international students. Recruiters are also using **misinformation** about pathways to permanent residence to facilitate recruitment. In this context, there was a need to reduce the number of study permits issued, at least for certain provinces and/or institutions. IRCC has **taken steps** to reduce and realign the study permit program. A smaller scale program will ease the process of testing and implementing oversight mechanisms and allow Canada to move to a healthier environment for international students.



It is crucial that multi-stakeholder tables, with members including those directly affected by the decisions, be struck to ensure that these changes can be planned, implemented and evaluated effectively.

## International Mobility Program

A reduction in study permits now will lead to a gradual reduction in the size of the International Mobility Program, since fewer people will receive post-study work permits. This will contribute to an overall goal of reducing the size of the temporary immigration levels.

## Temporary Foreign Worker Program

The Temporary Foreign Worker Program (TFWP) was conceived as a small program to fill temporary vacancies. But since its inception, it has grown significantly, including a rapid expansion in **recent years**.

There is reason for concern about the size and operation of the TFWP. Many of the vacancies filled by temporary foreign workers are structural or long-term vacancies, rather than temporary. But there are limited opportunities for people in agriculture and low wage occupations to **transition to permanent residence**. This has led to a *de facto* condition of **permanent temporariness** among many temporary foreign workers. Instances of abuse are too common within the program, which has been **criticized** by a UN Special Rapporteur for perpetuating contemporary forms of slavery.

Significant **structural changes** are needed, including greater limits on the size of the TFWP. Temporary permits should be reserved for *temporary* vacancies. The use of the program to fill seasonal vacancies should be phased out.

## Settlement and Inclusion

Immigration levels and selection policy must not occur in a vacuum. They must be tied to Canada's ability to support immigrants' settlement, including integration of immigrants into the Canadian workforce.

For example, Canada may set a high target for economic immigration with the objective of contributing to Canada's economy and workforce. If those immigrants experience long delays in finding work and find themselves underemployed, the effort of recruiting and selecting highly-skilled individuals has gone to waste.



Excellent settlement policies also help secure Canada's competitive advantage. Canada is **not the only country** that is facing an aging workforce and labour shortages. Canada is part of a global race to attract immigrants who can succeed. Many of our competitors have not yet engaged seriously in this race. But complacency would be unwise. Canada's early advantage could be lost if other countries innovate and offer a better value proposition to a mobile global populace. In particular, Canada should maintain a focus on immigrants' sense of welcome and their experiences of economic inclusion.

In the area of economic inclusion, there is much work left to be done. Existing **research** shows that immigrants at all levels of education face significant barriers to employment in Canada, including the devaluation of educational credentials and experience; bias in favour of Canadian work experience rather than assessment of competencies; limited social capital; and xenophobia and racism, both covert and overt. A **2021 study** by the Business Development Bank of Canada found that, even in the midst of hiring difficulties, few businesses look to hiring immigrant talent.

Better strategies to integrate immigrants into the workforce are needed. Canada should aim to be the best in the world at recognizing credentials of newly-arrived immigrants, in both licensed and non-licensed occupations.