

Immigration, Refugees, and Citizenship Canada Consultation: Express Entry Reforms

Written Submission from World Education Services

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Introduction

Express Entry (EE) is a powerful tool for selecting economic immigrants. WES welcomes the opportunity to provide feedback on proposed changes. To deliver on the promise of EE, WES is calling for:

- A greater emphasis on a whole-of-government approach that optimizes immigration to achieve long-term objectives for Canada shared across government departments
- A more robust definition of success, looking not just for high earners but for immigrants who will thrive personally and professionally and make long-term contributions to Canada
- A focus on permanent immigration, rather than temporary and multi-step immigration

Regulatory Changes to Immigration Programs

Opportunity: Improving Client Experience

WES supports the effort to improve the client experience through greater clarity and a reduction of duplication by creating a single Express Entry (EE) immigration program with uniform eligibility requirements.

Risk: Making Decisions Based on an Incomplete Definition of “Success”

WES supports a data-driven approach to determine eligibility criteria for a new single EE immigration program. However, the definition of success should be revised to reflect that immigration has the greatest value to Canada—and is most attractive to prospective immigrants—when it leads to long-term settlement and the ability of newcomers to achieve their full potential. This requires a focus on factors associated with immigrant retention, including quality of life, a sense of belonging, and opportunities for professional growth.

RECOMMENDATION 1: Re-define success to reflect indicators that capture long-term value to Canada, including rate of commensurate employment, time to commensurate employment, sense of belonging, and median working years income (combining income and duration of labour market participation). A revised measure of success requires re-evaluating which factors are most strongly associated with success.

Risk: Embedding Narrow Eligibility Requirements into Regulations

In Canada, there is a need for immigrant workers across the occupational spectrum, to enable innovation and to deliver critical public services like childcare, health care, and infrastructure projects that build strong communities. The proposed regulatory changes would cut off Canada’s ability to use EE to select individuals who provide significant value to Canada.

Consider these examples of in-demand workers—meaning their occupations are identified by Employment and Social Development Canada (ESDC) as having a strong risk of labour shortage¹—who would be rendered ineligible for immigration through EE:

- Home support workers and caregivers; farm machinery operators; labourers in seafood processing; and industrial butchers and meatcutters

¹ ESDC. 2025. “Table 3: Future Labour Market Conditions.” [Canadian Occupational Projection System](#).

- Nurse aides, orderlies and patient service associates; heavy-duty equipment mechanics; and carpenters who are already working in Canada and excelling but who do not achieve CLB/NCLC 6 in all four skill areas
- Bilingual workers in any shortage occupation who hold CLB/NCLC 5 in both official languages

The concern is amplified because the proposed changes are not annual priorities, such as those within category-based selection. Rather, IRCC is proposing regulatory changes that are likely in place for years.

RECOMMENDATION 2: Retain the power to select from a diverse pool of newcomers, including those across the occupational skill spectrum and across a wider range of proficiency in Canada’s official languages. This means scrapping the proposed minimum TEER levels and revising proposed minimum language levels for a new single Express Entry immigration program.

Risk: Overlooking Broader Consequences of Eligibility Requirements

A likely effect of the proposed minimum eligibility requirements for a single EE immigration program is an expansion of temporary immigration to meet labour market shortages, increasing incidence of long-term temporariness and the population of immigrants who fall out of status.

Temporary immigration creates instability and turnover for employers. Temporary residence (TR) and permanent temporariness are associated with stress, poor health, and delayed settlement, as well as exploitation in employment and housing.²

Significant changes to economic immigration have implications for the economy, the labour force, and the work of immigration enforcement, meaning they affect temporary resident policy, as well as the work of departments such as ESDC, Innovation, Science and Economic Development Canada (ISED), Canada Border Services Agency (CBSA), and Health Canada.

RECOMMENDATION 3: Develop capacity for stronger collaboration across teams within IRCC and across government departments to engage a meaningful whole-of-government approach to all aspects of immigration.

RECOMMENDATION 4: Embed decisions about regulatory changes to Express Entry in a whole-of-government approach, including consultation with ESDC, ISED, CBSA, and Health Canada.

RECOMMENDATION 5: Measure the relationship between economic immigration policy and temporary resident policy using indicators of reliance on temporary residence, including the portion of workers in occupations with structural labour market shortages that are filled by temporary residents, the average duration of stay among temporary residents, and the rate of transition to permanent residence (PR) five years after entry to Canada.

² cf Goldring, Luin, Patricia Landolt, Marie-Pier Joly, and Salina Abji. 2024. [Hidden in Plain Sight: Precarious Legal Status Trajectories and their Long-term Consequences](#). Toronto: CEP Project; Amnesty International. 2025. [‘Canada has destroyed me’: Labour exploitation of migrant workers in Canada](#).

Changes to the Comprehensive Ranking System

Opportunity: Increasing TR to PR Transitions

The proposed changes to points allocations under the Comprehensive Ranking System (CRS) appear to be an effort to increase transitions to PR among those with temporary residence (TR), especially those in high-earning occupations. Given the present circumstance, in which there are many temporary residents settled and working in Canada, WES has consistently advocated for an increase in TR to PR pathways.³

Risk: Overweighting Earnings and Canadian Experience

As described above, WES is calling for a more robust measure of success that means re-calibrating who should be prioritized for PR. While high earners should certainly have an opportunity to immigrate, there are limits to this approach. A system optimized for earnings risks undervaluing essential, but lower-wage, occupations. Similarly, IRCC's current analysis may undervalue the role that family ties play in supporting long-term settlement and retention (see Recommendation 1).

The proposed points for those with Canadian experience will result in disadvantages for top talent living abroad. Many of these individuals may not find attractive the proposition of moving to Canada with TR and hoping for the chance to get PR, particularly in a volatile policy environment where PR priorities are frequently shifting.

Furthermore, the composition of the pool of temporary residents will significantly influence the selection of new permanent residents, even though TR selection policy was not designed or optimized for this purpose. This speaks to a need for greater coordination across IRCC in developing immigration policies (see Recommendations 3 and 4 above).

Given Canada's demographic realities—historically low birth rates and an increase in the number of retirees—combined with projected labour market gaps and the risks of a large TR program, Canada's long-term interests are best served by a system that prioritizes one-step immigration.

RECOMMENDATION 6: Develop an economic immigration selection policy that reflects long-term labour market needs across the occupational and skill spectrum and a more robust measure of success.

RECOMMENDATION 7: Develop a strategy and timeline to pivot from multi-step immigration to a CRS points grid that prioritizes one-step immigration as the foundation of a stable, future-focused immigration system.

³ World Education Services. 2026. [Impacts of the Temporary Foreign Worker Program on the Labour Market](#), brief submitted to the Standing Committee on Human Resources, Skills and Social Development and the Status of Persons with Disabilities; World Education Services. 2025. [Canada's Immigration System](#), brief submitted to the Standing Committee on Citizenship and Immigration. World Education Services. 2024. [Immigration Levels](#), brief submitted to IRCC.

About WES

World Education Services is a non-profit social enterprise that supports the educational, economic, and social inclusion of immigrants, refugees, and international students. Since 2013, WES has been a designated provider of Educational Credential Assessments (ECAs) for IRCC. For over 50 years, WES has set the standard for international academic credential evaluation, supporting millions of people as they seek to achieve their academic and professional goals. Through decades of experience as a leader in global education, WES has developed a wide range of tools to pursue social impact at scale. From evaluating academic credentials to shaping policy, designing programs, and providing philanthropic funding, we partner with a diverse set of organizations, leaders, and networks to uplift individuals and drive systems change. Together with its partners, WES enables people to learn, work, and thrive in new places.