

Immigration, Refugees and Citizenship Canada Consultation: Economic priorities for category- based selection in Express Entry

Written Submission from World Education Services

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[World Education Services \(WES\)](#) welcomes the opportunity to contribute to Immigration, Refugees and Citizenship Canada's [consultation on economic priorities for category-based selection \(CBS\)](#) in Express Entry. WES submitted a response to the [online survey](#) as part of the consultation and is supplementing the survey response with this written submission.

Summary of Recommendations

- 1. Embed decisions about Canada's immigration selection system, including Express Entry and CBS, within a whole-of-government and whole-of-society approach, with coordination across federal departments, provinces, sectors, and civil society.**
- 2. Improve outcome reporting across all economic immigration programs, with indicators for rate of commensurate employment, time to licensure, time to commensurate employment, and retention by region and occupation.**
- 3. Ensure that any occupation selected through CBS is tied to a clear, viable pathway to licensure or direct entry to the workplace before invitations are issued.**
- 4. Remove the proposed minimum TEER levels and revise the proposed minimum language levels, so that Express Entry (including CBS) retains the ability to select from a diverse pool of newcomers across the occupational and skill spectrum.**

Recommendation 1: Embed decisions about Canada's immigration selection system, including Express Entry and CBS, within a whole-of-government and whole-of-society approach, with coordination across federal departments, provinces, sectors, and civil society.

WES sees immigration as a key driver of Canada's economic growth and considers Express Entry a powerful tool for selecting economic immigrants. However, determining whether Canada's immigration selection system should focus more on human capital or economic priorities (Q8) and the right balance between attracting top talent and filling occupations facing long-term shortages (Q16) requires: (1) a clear understanding of what the immigration system is trying to achieve; and (2) evidence of the outcomes of the current selection strategy.

WES has consistently called on the government to embed immigration policy (which includes the selection system and the decisions that shape it) within a long-term national strategy for workforce development and economic growth, with clearly defined objectives, articulated principles, and measurable outcomes.

This points to the need for a whole-of-government, whole-of-society approach to immigration policy and its selection system, including Express Entry. At the federal level, stronger coordination across ministries such as Immigration, Refugees and Citizenship Canada (IRCC), Employment and Social Development Canada (ESDC), Health Canada, Innovation, Science and Economic Development Canada (ISED), and Global Affairs Canada (GAC) is necessary to ensure that the selection system (including CBS) reflects broader national growth priorities and aligns with a long-term strategy.

Beyond the federal government, provinces, territories, and municipalities must act as equal partners in identifying needs. Industry, employers, regulatory bodies, and civil society also bring unique expertise and timely insights into shortages, systemic barriers, and integration challenges. These stakeholders must also be able to provide input on decisions that affect or are affected by immigration.

WES recommends:

- Establishing a cross-ministerial coordination mechanism involving IRCC, ESDC, Health Canada, ISED, and GAC to better align the policies that shape and are shaped by immigration, including Canada's selection system
- Setting clear objectives, articulated principles, and measurable outcomes for the immigration program
- Improving the predictability and transparency of CBS by announcing priority categories and anticipated balance between different Express Entry draw types in advance
- Clarifying the objectives of each draw and reporting results accordingly
- For Francophone Express Entry draws, defining clear objectives and measurable outcomes, and pairing selection with investments in French-language services and support for Francophone residents—immigrant and non-immigrant—already in Canada

Recommendation 2: Improve outcome reporting across all economic immigration programs, with indicators for rate of commensurate employment, time to licensure, time to commensurate employment, and retention by region and occupation.

WES also calls for an Express Entry system that tracks and reports relevant outcomes to support evidence-based decisions (Q8). Assessing whether human capital or priority occupation Express Entry draws are producing the intended results requires improved outcome reporting, with indicators for rate of commensurate employment, time to licensure, time to commensurate employment, and retention by region and occupation.

This is particularly relevant for Express Entry and CBS. Since its introduction in 2023, CBS has expanded rapidly. Although IRCC publishes invitation volumes and Comprehensive Ranking System (CRS) scores, what is not yet published is whether individuals selected through occupation-specific draws within CBS are employed in the occupations for which they were chosen.

WES recommends:

- Publishing regular, disaggregated outcomes data on the above-mentioned metrics for individuals selected through CBS
- Systematically linking data across departments and jurisdictions to make evidence-based decisions
- Embedding performance measurement and accountability mechanisms to track progress against stated goals
- Reporting the share of category-based invitations issued to candidates already in Canada, disaggregated by category

With that foundation in place, it would be possible to assess whether recent investments in selection policy are producing the intended results, to determine the balance between different draw types, and to hold the system accountable for outcomes over the short, medium, and long term. This would strengthen both immigration's potential and the selection system, while reinforcing the stability and predictability the system needs.

Recommendation 3: Ensure that any occupation selected through CBS is tied to a clear, viable pathway to licensure or direct entry to the workplace before invitations are issued.

Several sectors face acute and well-documented shortages, including those currently represented in identified labour shortage categories (Q11), despite recent efforts to address them through immigration.

At the same time, many internationally trained professionals and tradespeople are already in Canada, unemployed or working outside their fields because of systemic barriers to licensure, certification, and workforce integration. As a result, they cannot help to address those shortages.

Nearly [47 percent of internationally educated health professionals are unemployed or working in non-health roles](#), and RBC estimates that the underutilization of immigrant talent results in up to [\\$50 billion in lost GDP annually](#).

As WES emphasized in [its CBS submission in 2025](#), selecting candidates to address shortages without tackling the systemic issues that limit access to skills-commensurate employment risks expanding the pool of underutilized talent rather than filling workforce gaps.

Recruiting talent from abroad via CBS without also providing viable pathways to licensure, certification, and skills-commensurate employment puts immigrants at risk of encountering the same barriers on arrival, at a cost that is both economic and reputational. This means that it is difficult to assess the extent to which CBS is helping to address labour shortages in occupations where internationally trained candidates face significant barriers to licensure.

Canada's future workforce is, in large part, already here. Rather than modifying the selection criteria to find the perfect candidate, Canada must remove the systemic barriers that prevent those already here from working in their fields. The only way to address these barriers is through systemic reforms: harmonized licensing standards, competency-based assessment models, and targeted supports that help candidates attain licensure and certification.

Restricting prioritization to those who already hold Canadian work experience or licensure would narrow the talent pool without addressing the barriers to licensure or labour market integration, and would risk skewing the country-of-origin profile of selected candidates and undermining the diversity and fairness of the system.

Lastly, on which occupations, sectors, or types of talent Express Entry categories should prioritize (Q14), WES continues to call for time-bound measures to prioritize pathways to permanent residence for talent already in Canada on temporary status, with a longer-term transition to bringing in top talent with permanent status, rather than through temporary immigration.

WES recommends:

- Implementing a case-managed approach in which IRCC, working with provinces, territories, and regulatory bodies, confirms a viable licensure pathway for candidates in regulated professions and trades before selection
- Using CBS to transition international students, temporary workers, and internationally trained professionals and tradespeople already in Canada to permanent residence, and expanding international recruitment only after the number of temporary residents in Canada has been significantly reduced

Recommendation 4: Remove the proposed minimum TEER levels and revise the proposed minimum language levels, so that Express Entry (including CBS) retains the ability to select from a diverse pool of newcomers across the occupational and skill spectrum.

On whether the proposed Express Entry reforms should change the extent to which CBS is used (Q17): As mentioned above, the appropriate extent of CBS cannot be determined without an

immigration strategy, clear objectives, and evidence of whether CBS is producing its intended results. For that reason, WES cannot state whether selection through categories should increase, decrease, or remain the same. The priority is to establish that evidence first.

Two features of the proposed Express Entry changes and their relation to CBS are worth noting nonetheless. First, as WES set out in its [submission on Express Entry reforms](#), defining success mainly through language skills, education, and Canadian experience in high-wage occupations is a narrow measure that risks screening out workers who provide real value to Canada, including those in essential lower-wage occupations and those already working here below the proposed thresholds. The CRS already accounts for differences in candidate profiles.

Second, the proposed minimum requirements for training, education, experience, and responsibilities (TEER) and language skills would stop CBS itself from selecting essential workers, regardless of how high a priority their occupation is. Under the proposed minimum TEER levels, a health care draw could not select home support workers or nurse aides; under the proposed minimum language levels, a trades draw could not select carpenters or heavy-duty equipment mechanics who are already working in Canada but who do not reach Canadian Language Benchmarks (CLB)/Niveaux de compétence linguistique canadiens (NCLC) 6 in all four abilities.

If the government considers CBS a flexible tool for selecting candidates in response to identified economic goals beyond earnings potential, it must account for the fact that the proposed minimum requirements would leave it unable to select the essential, lower-wage workers whose priorities depend on.

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. 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. Since 2013, WES has been a designated provider of Educational Credential Assessments for IRCC.