



• July 15, 2024

Immigration levels plan 2025

CCR Submission

1. Introduction and Summary of Recommendations

The Canadian Council for Refugees (CCR) is a leading voice for the rights, protection, sponsorship, settlement, and well-being of refugees and migrants, in Canada and globally. The CCR is driven by more than 200 member organizations working with, from and for these communities from coast to coast to coast.

We welcome the opportunity to give input as part of the planning for the immigration levels for 2025 and beyond.

The immigration levels have enormous impacts on the lives of people seeking safety and a home in Canada. Behind the dry numbers, the decisions taken when setting the levels will determine whether some refugees can receive protection in Canada, how long refugees and others will wait for permanent residence and how many years children will be forced to wait separated from their parents. These significant wait times erode the well-being of affected families and the fabric and health of our whole society.

The immigration levels reflect Canadian values and affect how we are perceived internationally. As we balance the economic, family and refugee pillars of immigration, we must be conscious of the needs and rights of people in Canada but also the broader global community of which we are part.

At a time when the numbers of displaced persons around the world and the need for resettlement have been growing rapidly, Canada must increase its commitments to reflect our values of being an open and welcoming society and maintain our role as a global leader.

Recommendations

- Levels must be set to ensure equity in processing times across immigration categories, notably to address the fact that processing times for refugees are consistently among the longest of all categories.
- The government should publish the current inventory of applications in each immigration category, at the time of the announcement of the levels.

- The government should ensure that a minimum of 15% of total immigration admissions come from resettlement streams, including a minimum of 20,000 Government-Assisted Refugees per year.
- Government-Assisted Refugee levels should match or be higher than levels for Privately Sponsored Refugees.
- The government should, as a special initiative, increase the 2025 immigration targets for resettled refugees to a level that will allow the large accumulated backlog to be absorbed.
- Immigration levels for “Protected Persons in Canada and Dependents Abroad” must be sufficiently high so that accepted refugees and their family members abroad can receive permanent residence within 12 months. Until that target is reached, Temporary Resident Permits should be issued to dependents abroad of Protected Persons so that they can wait in Canada for finalization of their permanent residence.
- In the longer term, the government should amend the Immigration and Refugee Protection Act so that, barring any inadmissibility issues raised by the Canada Border Services Agency or IRCC, accepted refugees acquire permanent residence by operation of law, without the need for an application.
- Levels planning must ensure that responses to humanitarian crises are additional to regular levels numbers and do not take levels space away from other forcibly displaced populations.
- The government should be transparent about where within the levels they are placing people admitted in response to emergencies and special commitments.
- Rather than capping the numbers of international students and foreign workers, the government should review its policies with a view to ensuring that people who will be living here long-term either arrive as permanent residents or transition quickly to permanent residence. More specifically, the government should transform the Temporary Foreign Workers Program into a pathway that allows the workers required by our labour market to arrive as permanent residents.
- The government should give priority to ensuring that those who are in Canada with temporary status enjoy better protections, so that they are not subject to exploitation and abuse.
- The government should avoid using the vague and arbitrary category of “temporary residents” in discourse and levels planning. In particular, the government should never include refugee claimants in a category whose size the government aims to reduce.

- The government should reduce the numbers of people unnecessarily on temporary status by addressing the long delays experienced by many in Canada who are applying for permanent residence.
- The government should implement a broad and inclusive regularization program.
- The government must refrain from dangerous narratives that falsely connect immigration to the availability of housing and other core services for all in Canada.

2. Key principles

The CCR encourages the government to respect the principles of equity, transparency and additionality in the setting of the immigration levels.

a. Equity

The government's commitment to equity must be at the forefront as part of the levels setting exercise.

Levels must be set to ensure equity in processing times across immigration categories.

Processing times for refugees are consistently among the longest of all categories. It is unacceptable that, for example, children overseas of refugees in Canada must wait 50 months to be reunited with a parent, while most economic immigrants are processed within less than a year. Given that refugees and family members of refugees are often in situations of danger and themselves at risk of persecution, processing should be faster, not slower, than for economic immigrants. Similarly, refugees being resettled to Canada should not be required to wait years for processing. These long delays are caused by the low immigration targets for refugee categories.

Levels planning must also ensure that important and necessary responses to humanitarian crises do not take levels space away from other forcibly displaced populations.¹ It is unfair to delay processing of resettlement applications from refugees who have already spent years waiting for a durable solution because of the need to respond to an emergency. Similarly, those recognized as Convention Refugees in Canada must not be forced to wait even longer to be reunited with their immediate family.

¹See [Crisis Response Framework: CCR comments](#), May 2024.

b. Transparency

The government needs to be transparent about the numbers. The immigration levels plan is an important expression of this commitment. However, without more detailed information, many questions remain unanswered, and the impacts of the levels set are unclear.

The CCR urges the government to make clear where in the levels the government proposes to place people landed under public policies (such as the policies for Ukrainians and Sudanese).

The government should also be transparent about where special commitments fit within the numbers (such as the Afghans in the past, and, as current commitments, the Uyghurs and other Turkic Muslims and the 11,000 from the Western Hemisphere).

The CCR also requests that the government publish the current inventory of applications in each immigration category, at the time of the announcement of the levels. This is crucial to make plain what the levels mean for the categories of applicants that face multi-year processing times.

c. Additionality

Private sponsorship must be **additional** to the government's resettlement program. Canadians want to know that their government is fulfilling its responsibility, on behalf of all Canadians, to protect refugees through resettlement, and that any refugees they sponsor are **additional** to those resettled by the government. As part of this principle, the levels should ensure that as many, or more refugees are resettled by the government than by private sponsors.

Emergency measures must avoid negative impacts on others, including other refugees. Additionality needs to be respected both in terms of numbers (levels numbers, SAH allocations, etc.) and of resources.²

3. Resettlement levels

The CCR calls on the government to:

- ensure a minimum of 15% of total immigration admissions come from resettlement streams, including a minimum of 20,000 Government-Assisted Refugees per year
- ensure that Government-Assisted Refugee levels match or are higher than levels for Privately Sponsored Refugees.

a. 15% of immigration levels for resettlement, including 20,000 GARs

The global need for resettlement is greater than ever. The UNHCR projects that almost 3 million refugees will need resettlement in 2025. Canada and other resettlement countries must greatly increase the number of spaces they offer to meet the need – in 2023, less

² See [Crisis Response Framework: CCR comments](#), May 2024.

than 5% of the refugees identified as in need of resettlement were resettled.³ Canada can and must do more to respond to the many refugees in need of a safe place to call home.

Increasing resettlement to 15% of total immigration levels would result in the addition of 62,500 more persons resettled to Canada over the next two years.

| 2024-2026 Levels Plan | 2024 | 2025 | 2026 |
|--|----------------|----------------|----------------|
| Government-Assisted | 21,115 | 15,250 | 15,250 |
| Privately Sponsored | 27,750 | 28,250 | 28,250 |
| Blended Visa Office-Referred | 250 | 250 | 250 |
| Total resettled | 49,115 | 43,750 | 43,750 |
| Total immigration | 485,000 | 500,000 | 500,000 |
| Resettled as % of total immigration | 10% | 9% | 9% |
| Total resettled if increased to 15% | 72,750 | 75,000 | 75,000 |
| Differential | 23,635 | 31,250 | 31,250 |

As part of this increased commitment, the CCR continues to call on the government to set a minimum target of 20,000 Government-Assisted Refugees each year.

Government-Assisted Refugees are the most vulnerable people, chosen by the UNHCR because of their particular need.

The government must take the lead on resettling refugees, on behalf of all Canadians. When the government relies on private citizens to resettle more refugees than it, it is shifting the responsibility to protect refugees to civil society.

The government did increase the numbers of Government-Assisted Refugees recently with the responses to the Syrians and then Afghans. This shows that we have the infrastructure and the capacity to resettle 20,000 Government-Assisted Refugees a year.

However, according to the current three-year plan, starting in 2025 Government-Assisted Refugee numbers will go under 20,000 again: the targets are set at 15,250 a year. At a time when the need for resettlement is increasing, Canada should not be reducing its commitment to resettle refugees.

We call on the government to commit to a minimum of 20,000 Government-Assisted Refugees a year, in response to the global need for increased resettlement.

³ UNHCR: 2025 global refugee resettlement needs spike to almost 3 million, 4 June 2024

b. Additionality

The CCR continues to advocate that Canadians' private efforts through Privately Sponsored Refugees must always be additional to Government commitments. The levels for Government-Assisted Refugees must match or be higher than those for Privately Sponsored Refugees.

4. Resettled refugees: backlogs and processing delays

The CCR urges the government to increase the 2025 immigration targets for resettled refugees to a level that will allow the large accumulated backlog to be absorbed.

As clearly set out by the Auditor General in her 2023 report, [Processing Applications for Permanent Residence—Immigration, Refugees and Citizenship Canada](#), backlogs and processing times increase when intake numbers exceed admissions targets.

She highlights that these problems particularly affect refugees. In 2022, Government-Assisted Refugees and Privately Sponsored Refugees had the two longest average processing times of all the [categories she reviewed](#).

At the [beginning of 2022](#), the inventory of Government-Assisted Refugee applications was more than twice as large as the admissions target for that year, and for Privately Sponsored Refugees (PSR), it was more than three times as large.

According to the [2024-2025 Departmental plan](#), the government plans to “develop mechanisms to implement intake management measures, with the goal of shortening and establishing more predictable processing times for PSR clients.”

However, even if such a mechanism is put in place to reduce intake numbers, it will not:

- Address the existing backlog, which condemns refugee applicants to a 4 year wait.
- Address the Government-Assisted Refugee stream, which the Auditor General also noted has a very large inventory.

We note that there was already a significant backlog in 2020. During the pandemic, arrivals were halted, resulting in a large increase in inventories. As processing resumed, the CCR called for the unused target numbers to be carried over to future years, but this did not happen. Instead, the backlog has simply increased – to over 100,000 for Privately Sponsored Refugees.

A special initiative in 2025 to increase resettlement targets would allow the backlog to be absorbed and make possible a transition to a reasonable processing standard of 12 months. There would be huge public support for such a measure from communities across the country who are waiting impatiently for the arrival of the refugees they have sponsored.

5. Protected Persons and their family members

The CCR continues to highlight that refugees accepted through the refugee determination system in Canada need to be able to get on with their lives, and reunite with immediate family members overseas, as quickly as possible.

Unfortunately, the number of applications for Protected Persons in Canada and their dependents abroad far exceeds the immigration targets for this category. This is true both for the recent past and in the current plan. As a result, just as with resettled refugees, an enormous backlog has developed and applicants wait years for processing.⁴

Current processing times are completely unacceptable: Protected Persons in Canada wait 24 months⁵ while their family members abroad wait 50 months!⁶

We therefore urge:

- In the immediate, that the immigration levels for “Protected Persons in Canada and Dependents Abroad” be sufficiently high so that accepted refugees and their family members abroad can receive permanent residence within 12 months.
- In the longer term, that the Immigration and Refugee Protection Act be amended so that, barring any inadmissibility issues raised by the Canada Border Services Agency or IRCC, accepted refugees acquire permanent residence by operation of law, without the need for an application. This would avoid the issue of needing to provide space in the immigration levels and would free up IRCC time and resources.
- In the meantime, that Temporary Resident Permits be issued to dependents abroad of Protected Persons so that they can wait in Canada for finalization of their permanent residence. This would allow Canada to respect its obligations towards children’s rights and avoid lengthy and harmful separation of families.⁷

⁴ The Auditor General did not consider Protected Persons in Canada and Dependents Abroad in her 2023 report, [Processing Applications for Permanent Residence—Immigration, Refugees and Citizenship Canada](#), but her findings regarding the problems of backlogs and delays as a result of inadequate levels also apply to this category.

⁵ For applicants outside of Quebec. For applicants in Quebec, the wait time is currently listed as 39 months.

⁶ <https://www.canada.ca/en/immigration-refugees-citizenship/services/application/check-processing-times.html#immigration>

⁷ Joint CCR-CBA letter April 2024

| Immigration levels announced 2023 | 2024 | 2025 | 2026 | Total 2024 - 2026 |
|---|--------|--------|--------|-------------------|
| Protected Persons in Canada and Dependents Abroad | 27,000 | 29,000 | 29,000 | 85,000 |

| Growing inventory of applications of Protected persons and family members overseas | | | |
|--|----------------|---------------|----------------|
| Inventory as of... | September 2022 | February 2023 | August 2023 |
| Protected Persons in Canada | 48,905 | 56,800 | 68,000 |
| Dependants Abroad | 29,241 | 31,200 | 32,350 |
| Total | 78,146 | 88,000 | 100,350 |

The total levels numbers for the three years from 2024 to 2026 (85,000) are not enough for the more than 100,000 people who were already waiting in August 2023.

Since then, more people continue to be accepted as refugees and to submit their applications for permanent residence in this category:

| | 2023 | Projected 2024 (based on first quarter) |
|--|--------|---|
| Accepted as Protected Persons by the Refugee Protection Division | 37,222 | 44,328 |

6. Emergency responses

We welcome the government’s commitment to developing a Crisis Response Framework to guide Canada’s immigration responses to humanitarian crises that arise around the world. As part of that initiative, it is crucial to ensure we have a transparent and equitable way to include emergency responses in the levels.⁸

We note that responses in the past have sometimes displaced other refugees, both in using up levels space and in diversion of IRCC resources. As a result, other refugees have been denied an opportunity for resettlement, or have faced even longer waits than usual, in precarious circumstances. Commitments in response to humanitarian crises must be additional to the regular levels numbers.

The CCR is also concerned about a lack of transparency in the accounting of emergency responses. For example, the government did not explain clearly – either during or after – how the 40,000 Afghan commitment was fulfilled. Some Afghans with private sponsorship

⁸ Crisis Response Framework: CCR comments, May 2024.

applications in process long before the commitment was made were apparently included in the count of 40,000. The [2024-2026 Immigration Levels Plan](#) has a footnote for total resettled refugees saying: “Includes admissions from Canada’s response to the situation in Afghanistan, as well as the commitment to Uyghurs and other Turkic Muslims”. Another footnote explains that the Humanitarian and Compassionate category includes “some admissions from Canada’s response to the situation in Afghanistan.” This leaves the public with no idea of how many Afghans are included, under which category (GAR, PSR, BVOR or H&C) or in which year.

Again in the levels plan, the Humanitarian and Compassionate (H&C) category includes admissions “for reasons of public policy.” There are several public policies recently adopted that provide an avenue to permanent residence for people affected by crises (notably for Ukrainians and Sudanese). In the interests of transparency, the government should provide a breakdown in the levels between the various components of the H&C category.

We call on the government to clearly communicate, both in the levels plan and through retrospective reporting, how many people are projected or landed, by immigration category, year and specific emergency.

7. Proposed levels for temporary residents

The government has announced that it will include a target for temporary resident arrivals in the 2025–2027 Immigration Levels Plan, as part of efforts to decrease the share of temporary residents as part of the overall population from 6.2% in 2023 to 5% over the next 3 years.

The 6.2% figure appears to be based on the sum of the numbers at the end 2023 of:

- International Students
- Temporary workers under the International Mobility Program
- Temporary Foreign Workers
- Persons with a refugee claim pending before the Immigration and Refugee Board⁹

The CCR has long been concerned about shifts in Canadian policy leading to increasing numbers of people living in Canada for long periods of time with only temporary status. Historically, one of the major strengths of Canada’s immigration program has been our tradition of welcoming people as permanent residents. Over the last couple of decades, however, Canada has become a country where migrant workers are routinely brought in on a temporary basis. In

⁹ [Speaking notes for the Honourable Marc Miller, Minister of Immigration, Refugees and Citizenship: Announcement related to Temporary Residents](#), March 2024. On December 31, 2023, the government reports that there were in Canada: 1,040,985 study permit holders, 1,081,780 people in the International Mobility Program, 188,580 Temporary Foreign Workers and 156,032 claims pending at the Refugee Protection Division of the IRB. The sum of these numbers is 6.2% of 40 million, Canada’s population in June 2023.

2008, for the first time, the number of Temporary Foreign Workers in Canada exceeded the total number of permanent residents admitted in the same year.

People who have only a temporary status in Canada are vulnerable. They do not have access to the services and legal protections available to those with permanent status. The threat of being forced to leave Canada hangs over their head, if their visa is not renewed or they don't comply with all the conditions of their visa. This precarity and isolation makes them easily exploited.

For example some temporary status holders are subjected to labour restrictions: international students are formally limited to 24 hours a week of work off campus, while Temporary Foreign Workers have a permit tying them to one specific employer. These restrictions, which are not addressed by shifting to sectoral work permits, create dangerous power imbalances that facilitate exploitation and trafficking. Canadian society suffers, because people with precarious status cannot contribute to their full potential.

The CCR therefore supports initiatives to decrease the percentage of people in Canada with only temporary status. However, in our view, capping the numbers of international students and foreign workers is the wrong way to address this issue.

Rather, the government should review its policies with a view to ensuring that people who will be living here long-term either arrive as permanent residents or transition quickly to permanent residence. For those who are in Canada with temporary status, the priority should be to ensure that they enjoy better protections, including equal access to settlement services and social services, so that they are not subject to exploitation and abuse. Temporary workers pay the same taxes that Canadians pay towards our social safety nets: they deserve the same access to those benefits and services as everyone else in the country.

a. Replace the Temporary Foreign Worker Program with permanent pathways

Instead of restricting the number of Temporary Foreign Workers admitted to Canada, the government should fundamentally transform the program, enabling pathways that allow all the workers required by our labour market to arrive as permanent residents.¹⁰

- Capping the number of foreign workers admitted through the Temporary Foreign Worker and International Mobility Programs won't address the labour shortage that they are brought in to meet. In recent years there has been a marked increase in the number of Labour Market Impact Assessments (LMIAs) approved, across a wide range of sectors.¹¹

¹⁰ With respect to workers with temporary status, CCR's focus has been on those in the Temporary Foreign Worker Program, given that they are the most vulnerable.

¹¹ CBC, [From fast food to construction, employers turn more and more to temporary foreign workers](#), 24 June 2024

This demonstrates both that employers are struggling to fill the positions they have available and that the government recognizes that there are no Canadian workers available to fill the positions. Setting a maximum number of foreign workers that can be admitted will leave some of those jobs unfilled.

- A reduction in the number of foreign workers admitted will also do nothing to reduce the vulnerability of those workers who are admitted. The structural problems inherent in precarious status will continue to expose them to exploitation and abuse.¹²

The CCR continues to urge the government to reform the economic immigration program so that it recognizes the skills and contributions of people needed for so-called low skilled jobs in the Canadian labour market, enabling them to arrive in Canada as permanent residents.

b. “Temporary residents” should not be used as a general category in the levels

The CCR is concerned at the introduction into the discourse and into IRCC’s levels planning processes of “temporary residents” as a category.

The Minister has described “temporary residents” as “a big umbrella term for a large number of streams and programs under IRCC management” and, as noted above, has identified the main categories as International Students, workers under the International Mobility or Temporary Foreign Workers Program and people waiting for their refugee claim to be heard by the Immigration and Refugee Board.¹³

We note that there are in fact many others in Canada who could also be described as temporary residents, including those who entered with the Canada-Ukraine authorization for emergency travel (CUAET) visa. Between March 17, 2022 and April 1, 2024, 298,128 Ukrainians arrived in Canada under CUAET.¹⁴ Although some of these Ukrainians have since left Canada, and others may have become permanent residents, a significant number remain in Canada as temporary

¹² The violations of migrant workers’ rights in Canada as a result of vulnerability caused by the Temporary Foreign Worker Program are well-documented, including by Tomoya Obokata, Special Rapporteur on the global scourge of modern slavery appointed by the UN Human Rights Council, in his [statement at the conclusion of his 2023 visit to Canada](#).

¹³ [Speaking notes for the Honourable Marc Miller, Minister of Immigration, Refugees and Citizenship: Announcement related to Temporary Residents](#), March 2024.

¹⁴ <https://www.canada.ca/en/immigration-refugees-citizenship/services/immigrate-canada/ukraine-measures/key-figures.html>

residents. It is not clear why they have been excluded from the count, and others such as refugee claimants are included.¹⁵

The inclusion of refugee claimants at all as part of a category that the government is proposing to reduce is very disturbing. Canada has legal and moral obligations towards people who are fleeing persecution and seeking asylum here. As the number of refugees increases worldwide, we should expect to see increased numbers of refugee claimants in Canada; and put systems in place to address their rights fairly and effectively.

Although the government is currently only communicating plans to set targets for International Students and foreign workers, the inclusion of refugee claimants as part of the temporary resident category that the government wants to reduce to 5% of the population indirectly commits the government to attempting to reduce the number of refugee claimants. Certainly, it is legitimate and important for the government to reduce the backlog of claimants with temporary status awaiting determination by ensuring the Immigration and Refugee Board is adequately resourced so that people get a rapid decision on their refugee claim, moving out of temporary status. However, the framing of the government target may lead to governments, political leaders and the Canadian public concluding that we need to reduce the number of refugee claims. This is dangerous framing that not only runs counter to our obligations but can undercut public support for our long tradition and values as a refugee welcoming country.

We should be aware that other countries, mostly countries far poorer than Canada, are hosting refugees and people in refugee-like situations at a much higher per capita than Canada: for example, Lebanon at 15%, Chad at 5%, or Colombia at 4%.

Another category of temporary residents is people on a Temporary Residence Permit (TRP). The TRP is a valuable policy tool that gives immediate status to people who fall between the cracks in Canada's immigration system. Many of them are vulnerable persons who have already experienced abuse: victims of trafficking or of family violence. We understand that there are no plans currently to cap TRPs, which we welcome given the importance of the tool. However, we are concerned that the preoccupation with limiting overall numbers of "temporary residents" might lead to pressures, whether direct or implicit, to limit the use of TRPs.

For the above reasons, the category of temporary residents should not be used in the levels.

¹⁵ Similarly, although the numbers are much smaller, recent public policies provide for citizens of Haiti, Sudan, Gaza and Israel and Iran to remain in Canada on a temporary visa, with access to a work or study permit.

c. Reduce temporary resident numbers by granting permanent residence more quickly

We believe that, rather than focusing on setting levels for temporary residents, the government should address the long delays experienced by many in Canada who are applying for permanent residence. The failure of the government to process permanent residence applications in a timely way keeps people unnecessarily on temporary status.

The government's current approach excludes from the "temporary resident" category people whose refugee claim has been approved by the Immigration and Refugee Board and thus are Protected Persons. Their status is not "temporary" in that there is no end date. Yet, without permanent residence they face many of the same constraints and limitations as temporary residents and are unable to get on with their lives and contribute to their full potential.

There are many other categories of people waiting to transition from temporary status to permanent residence. Often they wait years – in part at least as a result of the immigration levels.

There are also significant numbers of people living with no status, often for many years. Their contributions are significant and yet their lives are marked with vulnerability and inequity in access to rights and services. As CCR has long **advocated**, society as a whole would be strengthened by a broad regularization program so that those without status can take their place as permanent residents.

8. Integration of housing, health care and other services in levels planning

The CCR is deeply concerned that by linking temporary and permanent resident numbers to pressures on housing and other services, the government is reinforcing a common tendency to blame vulnerable newcomers for our society's problems. They are an easy target for scapegoating. When political leaders point the finger at newcomers, sometimes as a way to score political points, public support is weakened.

We are already seeing an increase in negative attitudes – a disturbing trend away from the high levels of support that Canadians have traditionally shown to newcomers. It is crucial that the government work to dismantle misconceptions rather than reinforce them.

In its **Strategic Plan**, IRCC committed to "seek to integrate housing and health care planning, along with other important services, into planning Canada's immigration levels". We challenge the basis for the linkage being made by the government. Newcomers do not cause housing and other shortages, nor will reducing numbers solve the issues.

Canadians, led by the federal and provincial governments, need to take responsibility for the policies that drive the cost and availability of housing. As recognized by the 2019 **National Housing Strategy Act**, housing is a human right.

The federal and provincial governments must reform housing laws, policies and programs to reflect the right to housing, and should involve communities in meaningful ways in the process. The government must also refrain from dangerous narratives that falsely connect immigration to availability of housing and other core services for all in Canada.