



HOUSE OF COMMONS  
CHAMBRE DES COMMUNES  
CANADA

# **DIFFERENTIAL TREATMENT IN RECRUITMENT AND ACCEPTANCE RATES OF FOREIGN STUDENTS IN QUEBEC AND IN THE REST OF CANADA**

**Report of the Standing Committee on Citizenship and  
Immigration**

**Salma Zahid, Chair**

**MAY 2022  
44th PARLIAMENT, 1st SESSION**

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Chair**

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### **Reports from committees presented to the House of Commons**

Presenting a report to the House is the way a committee makes public its findings and recommendations on a particular topic. Substantive reports on a subject-matter study usually contain a synopsis of the testimony heard, the recommendations made by the committee, as well as the reasons for those recommendations.

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# **THE STANDING COMMITTEE ON CITIZENSHIP AND IMMIGRATION**

has the honour to present its

## **EIGHTH REPORT**

Pursuant to its mandate under Standing Order 108(2), the committee has studied recruitment and acceptance rates of foreign students and has agreed to report the following:



## TABLE OF CONTENTS

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SUMMARY.....	1
LIST OF RECOMMENDATIONS .....	3
DIFFERENTIAL TREATMENT IN RECRUITMENT AND ACCEPTANCE RATES OF FOREIGN STUDENTS IN QUEBEC AND IN THE REST OF CANADA.....	11
Introduction.....	11
Chapter 1: Welcoming International Students: Policy, Programs, and Issues.....	12
International Student Mobility.....	12
How Do International Students Come to Canada?.....	17
Study Permit.....	18
Specific Programs.....	19
Student Direct Stream .....	19
Nigeria Student Express .....	22
Francophone Immigration Strategy.....	24
Recruitment Efforts .....	27
Chapter 2: The Reality of High Refusal Rates .....	32
Experiences of High Refusal Rates.....	32
Student Permit Data .....	34
Processing Times.....	34
Refusal Rates.....	36
Differences by Country of Origin.....	37
Refusal Rates by Region of Recruitment .....	47
Refusal Rates by Level of Education .....	48
Chapter 3: Potential Reasons for Refusals and Refusal Rates.....	48
Refusals Based on Immigration Law and Regulations.....	49
The Obligation to Leave Canada by the End of the Authorized Period of Stay .....	49

Dual Intent .....	52
Sufficient Funds Without Needing to Work .....	55
Potential Causes for Systemic Differences in Decisions .....	57
Reported Racism at Immigration, Refugees, and Citizenship Canada .....	58
Different Program Rules and Requirements .....	61
Data Technology in the Application Process .....	62
Advanced Analytics and Temporary Resident Visas .....	63
Chinook .....	66
Barriers Within the Application Process.....	71
Chapter 4: Integration and Retention.....	74
The Current Labour Market .....	74
Measures to Integrate International Students .....	76
Canadian Work Experience .....	76
Settlement Services .....	79
People-to-People Ties.....	80
Conclusion .....	81
APPENDIX A: IMMIGRATION, REFUGEES AND CITIZENSHIP CANADA STATISTICS ON THE REASONS FOR REFUSAL GIVEN DURING THE 2019-2021 PERIOD .....	83
APPENDIX B: LIST OF WITNESSES .....	139
APPENDIX C: LIST OF BRIEFS.....	143
REQUEST FOR GOVERNMENT RESPONSE .....	145

## SUMMARY

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Over the last five years, Immigration, Refugees and Citizenship Canada (IRCC) has seen significant growth in its programs designed to welcome international students to Canada. This growth brings opportunities and challenges.

The House of Commons Standing Committee on Citizenship and Immigration (the Committee) decided to study the recruitment and acceptance rates of foreign students in Quebec and in the rest of Canada, including francophone students from African countries. It wanted to understand the realities of increasing processing times and higher refusal rates and their impact on students and institutions, which is explored through testimony and data in Chapter 2.

This report discusses, in its first chapter, the important and growing responsibility for the federal government to attract, select and retain international students in relation to the responsibilities of the provinces and the Canadian designated learning institutions. It lays out the different programs and policies that frame international student mobility to Canada.

Chapter 3 explores the reasons given for refusals and explains potential causes for systemic differences in decisions by IRCC officials. Finally, the fourth chapter examines the opportunities presented by welcoming international students to Canada and the need to integrate and retain students after their studies. Overall, based on testimony from 31 witnesses and several briefs, the Committee makes 35 recommendations to IRCC and to the federal government, more broadly.



# LIST OF RECOMMENDATIONS

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*As a result of their deliberations committees may make recommendations which they include in their reports for the consideration of the House of Commons or the Government. Recommendations related to this study are listed below.*

## **Increase Dialogue between the Governments of Quebec and Canada**

### **Recommendation 1**

**That Immigration, Refugees and Citizenship Canada increase the dialogue between the Governments of Quebec and Canada to ensure that the Canada–Quebec Accord is respected on both sides, including Quebec’s selection of applicants. .... 18**

## **Review and Expand the Student Direct Stream**

### **Recommendation 2**

**That Immigration, Refugees and Citizenship Canada review the Student Direct Stream, its criteria and its fair applicability across different countries and expand the Student Direct Stream to other countries in Africa, such as Nigeria and Ghana, including Francophone nations, and Asia, such as Bangladesh. .... 22**

## **Explore Alternative Mechanisms for the Validation of Financial Information**

### **Recommendation 3**

**That Immigration, Refugees and Citizenship Canada, in light of the testimony highlighting the challenges surrounding the validation of financial information of prospective international students, explore alternative mechanisms to perform this validation; and that the Government of Canada encourage the expansion of partnerships between Canadian and international financial institutions..... 22**

## **Review the Criteria of the Nigeria Student Express Program**

### **Recommendation 4**

**That Immigration, Refugees and Citizenship Canada review the criteria for the Nigeria Student Express program, reconsider its financial requirements in light of other existing programs for international students, such as the Student Direct Stream, and remove the English language proficiency requirement for**

**Nigerian students in order to ensure a fairness of requirements across programs..... 24**

**Publish Information about the Nigeria Student Express Program**

**Recommendation 5**

**That Immigration, Refugees and Citizenship Canada publish on its website information about the Nigeria Student Express pilot program and its criteria to better inform prospective international students, Canadian educational institutions and other partners in the international education sector..... 24**

**Reduce High Refusal Rates for Student Visas to Meet Francophone Immigration Targets and Address the Labour Shortage**

**Recommendation 6**

**That Immigration, Refugees and Citizenship Canada provide a comprehensive plan on how to reduce the high rates of refusal for student visas, in order to help meet francophone immigration targets and address the labour shortage in Canada, including in Quebec..... 27**

**Issue Directive with Respect to Francophone Immigration**

**Recommendation 7**

**That Immigration, Refugees and Citizenship Canada issue to all Canadian visa offices a directive reminding them of the federal government’s obligations with respect to francophone immigration. .... 28**

**Promote Canada as a Study Destination**

**Recommendation 8**

**That the Government of Canada, provinces and territories, and designated learning institutions work together to find new and innovative ways to better promote Canada as a study destination for international students, and for the purposes of retention put special consideration on how to better inform French-speaking prospective students about the opportunities to study in French outside of Quebec. .... 31**

**Regulate the Educational Service Provider Industry**

**Recommendation 9**

That Immigration, Refugees and Citizenship Canada work with provincial and territorial counterparts, as well as Canadian designated learning institutions, to regulate recruiters in the international educational sector, and ensure that the information packages provided to these recruiters include information on how student applicants can safeguard themselves against fraud. .... 31

**Ensure Simple, Accurate and Coherent Information is Available**

**Recommendation 10**

That Immigration, Refugees and Citizenship Canada ensure that simple and accurate information about applications is always available, and that Global Affairs Canada and Immigration, Refugees and Citizenship Canada are always presenting consistent information. .... 31

**Standardize Tuition Reimbursement Policies**

**Recommendation 11**

That Immigration, Refugees and Citizenship Canada promote standardizing tuition reimbursement policies for Canadian and Quebec universities and institutions when an individual’s study permit application is refused. .... 34

**Provide Data on Study Permit Processing Times**

**Recommendation 12**

That Immigration, Refugees and Citizenship Canada provide data on study permit processing times and reasons for refusal, broken down by applicants’ country of origin and other available demographic variables, in the department’s Annual Report to Parliament on Immigration. .... 36

**Review and Ease the International Student Selection Criteria and Processes**

**Recommendation 13**

That Immigration, Refugees and Citizenship Canada review international student selection criteria and processes, make the study permit application process more transparent, reduce application processing times, and allow more flexibility for the evidence used to establish that an applicant meets the financial criteria. .... 51

**Provide Consistent Processing Times**

**Recommendation 14**

**That Immigration, Refugees and Citizenship Canada work to provide for consistent processing times for the same application categories across different visa offices. .... 51**

**Review and Clarify Dual Intent Provision**

**Recommendation 15**

**That Immigration, Refugees and Citizenship Canada review and clarify the dual intent provision, sections 20(1)(b) and 22(2) of the *Immigration and Refugee Protection Act*, so that the intention of settling in Canada does not jeopardize an individual’s chances of getting a study permit. .... 54**

**Evaluate Students on Their Potential and Value to Canadian Institutions and Communities**

**Recommendation 16**

**That Immigration, Refugees and Citizenship Canada evaluate students on their potential and value to Canadian institutions and communities, not on their ties to their home countries. .... 55**

**Provide More Transparency in Refusals**

**Recommendation 17**

**That Immigration, Refugees and Citizenship Canada publish the guidelines given to its officers, provide the acceptance criteria for study permits and visas, and further offer more fulsome justifications to applicants for the refusal of their applications. .... 57**

**Create Direct Lines of Communications**

**Recommendation 18**

**That Immigration, Refugees and Citizenship Canada create direct lines of communication between visa offices and designated learning institutions so that they may share information on an on-going basis about student applications, provided that the institution is authorized by the student to do so. .... 57**

**Conduct and Publish Regular Reports on the Results of Ant-Racist and Anti-  
Oppression Trainings**

**Recommendation 19**

**That Immigration, Refugees and Citizenship Canada conduct and publish regular reports similar to the Pollara Strategic Insights Report, and that Immigration, Refugees and Citizenship Canada provide regular metrics on the results of the anti-racist and anti-oppression trainings undertaken by the department..... 61**

**Collect Race-Based Data**

**Recommendation 20**

**That Immigration, Refugees and Citizenship Canada collect race-based data and that offices with high refusal rates be automatically audited by a third party..... 62**

**Conduct a Study of the Anti-Black and Anti-Francophone African Racism in  
Canada’s Immigration History**

**Recommendation 21**

**That Immigration, Refugees and Citizenship Canada conduct a detailed bilingual study of the social history of anti-Black and anti-Francophone African racism in Canadian immigration to ensure mistakes are not repeated..... 62**

**Publish information about Chinook**

**Recommendation 22**

**That Immigration, Refugees and Citizenship Canada publish information on all artificial intelligence software programs and e-tools, including but not limited to Chinook, to ensure better transparency in the department’s processing and use of automation..... 70**

**Undertake Public Consultations Regarding New Technologies**

**Recommendation 23**

**That Immigration, Refugees and Citizenship Canada undertake meaningful public consultations on the deployment of new technologies to process immigration applications, including automated technologies, Chinook and artificial intelligence..... 70**

**Conduct a Gender-Based Analysis Plus of Chinook**

**Recommendation 24**

**That Immigration, Refugees and Citizenship Canada conduct a Gender-Based Analysis Plus (GBA+) of the Chinook software program and its impact on the processing of temporary resident visas, and publish a report on the findings. .... 70**

**Audit Chinook**

**Recommendation 25**

**That Immigration, Refugees and Citizenship Canada submit the Chinook software program to a third-party audit and publish the audit report. .... 70**

**Conduct an Algorithmic Impact Assessment and Independent Race-Equity Review of Chinook**

**Recommendation 26**

**That Immigration, Refugees and Citizenship Canada ensure Chinook goes through a proper algorithmic impact assessment and independent race-equity review. .... 70**

**Require Independent Oversight for Chinook and Artificial Intelligence Tools**

**Recommendation 27**

**That Immigration, Refugees and Citizenship Canada require independent oversight for both Chinook and the expansion of artificial intelligence and offer greater transparency regarding the algorithmic impact assessments, privacy assessments and equity consultations that the processes undergo. .... 71**

**Provide Additional Resources and Infrastructure for Processing in Africa and South Asia**

**Recommendation 28**

**That Immigration, Refugees and Citizenship Canada provide additional resources for immigration processing in visa offices currently in Africa and South Asia, review its international network and add additional visa offices or visa application centres in Africa and South Asia..... 73**

**Conduct Blind Reviews of a Sample of Applications**

**Recommendation 29**

**That Immigration, Refugees and Citizenship Canada conduct regular blind reviews of a sample of applications from random visa offices in each region of the department’s international network to verify consistency in decision-making. .... 73**

**Establish an Ombudsperson Office at Immigration, Refugees and Citizenship Canada**

**Recommendation 30**

**That Immigration, Refugees and Citizenship Canada establish an ombudsperson office to oversee the department’s immigration operations and policies. .... 74**

**Provide Appropriate Resources for the Establishment of an Ombudsperson Office**

**Recommendation 31**

**That Immigration, Refugees and Citizenship Canada provide the appropriate resources for the establishment of an ombudsperson’s office to review the department’s policies, receive and review complaints, review regular reports on racism and training procedures; and that the office be empowered to take appropriate enforcement measures in relation to these activities..... 74**

**Issue Work Permits to Students in Co-op Programs**

**Recommendation 32**

**That Immigration, Refugees and Citizenship Canada issue a work permit automatically and at no extra cost at the same time as study permits for students enrolled in a co-op program. .... 78**

**Not Require Work Permits for Work-Integrated Learning**

**Recommendation 33**

**That Immigration, Refugees and Citizenship Canada recognize that students enrolling in specific learning programs will be doing work-integrated learning, such as internships, and that in the context of these studies no work permit is necessary..... 79**

**Develop a Special Program for International Students Without Financial Means**

**Recommendation 34**

**That Immigration, Refugees and Citizenship Canada develop a special program that would allow international students without financial means to come to Canada and work full-time on an open work permit while studying part-time, and that Immigration, Refugees and Citizenship Canada review the requirements to ensure that these students are not disqualified from the Post-Graduate Work Permit Program. .... 79**

**Fund Tailored Settlement Services for International Students**

**Recommendation 35**

**That Immigration, Refugees and Citizenship Canada partially fund tailored settlement services for international students on their path to permanent residency, as well as parallel sponsorship measures for those who want to obtain permanent residency..... 80**



# DIFFERENTIAL TREATMENT IN RECRUITMENT AND ACCEPTANCE RATES OF FOREIGN STUDENTS IN QUEBEC AND IN THE REST OF CANADA

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## INTRODUCTION

The House of Commons Standing Committee on Citizenship and Immigration (the Committee) decided on 1 February 2022<sup>1</sup> to study the recruitment and acceptance rates of foreign students in Quebec and in the rest of Canada, including francophone students from African countries.<sup>2</sup> The study included discussions about the use of data analytic tools by Immigration, Refugees and Citizenship Canada (IRCC or the department).

Between 1 February 2022 and 1 March 2022, the Committee heard from 31 witnesses, including the Minister of Immigration, Refugees and Citizenship, the Hon. Sean Fraser, and departmental officials from IRCC. The Committee also received several briefs and written submissions.<sup>3</sup>

Chapter 1 of this report provides a short overview of the mobility of international students to Canada and elsewhere. It then discusses Canada's policy and programs for international students. Chapter 2 describes the realities of processing times and refusal rates and provides additional context for witnesses' testimony with data. Chapter 3 reviews the reasons given for refusals and explains potential causes for systemic differences in decisions by IRCC officials. The final chapter addresses witness testimony about how to integrate international students who want to join Canada's labour market and how to retain those who wish to settle into Canada permanently.

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1 House of Commons, Standing Committee on Citizenship and Immigration (CIMM), *Minutes of Proceedings*, 1 February 2022.

2 The terms foreign students and international students are used interchangeably in this report.

3 CIMM, *Recruitment and Acceptance Rates of Foreign Students*.



## CHAPTER 1: WELCOMING INTERNATIONAL STUDENTS: POLICY, PROGRAMS, AND ISSUES

Chapter 1 provides an overview, first, of the global landscape for international student mobility. It then looks at the federal government’s policy and programs designed to welcome international students to Canada, including francophones. Lastly, this chapter addresses issues raised by witnesses with respect to these policies and programs.

### International Student Mobility

Throughout the Committee’s study, witnesses shared the dreams and ambitions of prospective international students who chose Canada to pursue their studies. They also shared the disappointment and hurt of these same students when Canada refused their study permit application. The testimony mostly drew from examples from Africa, particularly francophone Africa. As explained in a brief, this is because “[i]n that region of the world, population growth is such that young people who aspire to higher education must carry out their plans abroad.”<sup>4</sup>

Nevertheless, witnesses stressed the importance of international students to Canada for local communities,<sup>5</sup> especially in today’s labour market—an issue further developed in Chapter 4. Foreign students “contribute over \$22 billion to the Canadian economy and support over 218,000 jobs.” They “also play a fundamental role in building Canada’s highly skilled talent pipeline.”<sup>6</sup> Overall, the Committee heard about the need to grow new talent to be competitive globally, especially for the viability of Canada’s “research institutions, knowledge industries and key sectors.”<sup>7</sup> A critical mass of enrolled foreign

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4 Université Laval, [Brief](#), p. 7.

5 CIMM, [Evidence](#), 10 February 2022, 1105 (Carole St. Laurent, Associate Vice-President, International, Kwantlen Polytechnic University); 1115 (Pirita Mattola, Manager, International Student and Study Abroad Centre, University of Saskatchewan); Universities Canada, [Brief](#), p. 2; EduNova, [Brief](#), p. 1.

6 CIMM, [Evidence](#), 1 February 2022, 1200 (Paul Davidson, President and Chief Executive Officer, Universities Canada); CIMM, [Evidence](#), 3 February 2022, 1120 (Christian Fotang, Chair of the Board of Directors, Canadian Alliance of Student Associations).

7 CIMM, [Evidence](#), 1 February 2022, 1225 (Larissa Bezo, President and Chief Executive Officer, Canadian Bureau for International Education); Université Laval, [Brief](#), p. 8.

students also allows Canadian educational institutions to maintain the delivery of certain programs.<sup>8</sup> As explained in a brief written by Le Québec c'est nous,

[l]arge Canadian universities undertake major recruiting missions overseas. Whether to attract talent in specific areas of research, to meet labour needs here, or to improve their financial situation, Canadian universities spend time and energy to recruit international students. Their recruiters are not only selling the prestige and quality of the learning institutions in Canada and Quebec, they are also selling a bright, lifelong future. For those universities, it is not simply a question of study. For years, and certainly since the pandemic began, the Government of Canada has been using various tools and programs to ensure that the students who are educated here can settle in, and contribute to, Canada.<sup>9</sup>

The Canadian Alliance of Student Associations pointed out that “[i]n addition to the value they inject into the Canadian economy, international students who decide to stay in Canada after their studies are essential to addressing the ongoing skilled worker shortage across the country.”<sup>10</sup>

Witnesses recognized that Canada is a leader in welcoming international students.<sup>11</sup> Larissa Bezo, President and Chief Executive Officer of Canadian Bureau for International Education, in particular highlighted that “Canada's [international education] sector has seen exponential growth in recent years, increasing by some 135% since 2009.”<sup>12</sup> According to an IRCC report, in 2017 Canada had the seventh-highest percentage of international students enrolled in post-secondary education in comparison to other Organisation for Economic Co-operation and Development (OECD) countries.<sup>13</sup> However, Paul Davidson, President and Chief Executive Officer, Universities Canada, said that the global competition for international student mobility is intensifying and Canada will

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8 Université Laval, *Brief*, p. 8; CIMM, *Evidence*, 1 February 2022, 1250 (Paul Davidson); CIMM, *Evidence*, 10 February 2022, 1215, 1235 (Alain-Sébastien Malette, Associate Vice-President, International, University of Ottawa); CIMM, *Evidence*, 1 March 2022, 1110 (François Dornier, président du conseil d'administration, Réseau des cégeps et des collèges francophones du Canada).

9 Le Québec c'est nous aussi, *Brief*, p. 7.

10 CIMM, *Evidence*, 3 February 2022, 1120 (Christian Fotang).

11 CIMM, *Evidence*, 1 February 2022, 1200 (Paul Davidson); 1230 (Francis Brown Mastropaolo, Director, International Affairs, Fédération des cégeps); CIMM, *Evidence*, 10 February 2022, 1215 (Alain-Sébastien Malette); Universities Canada, *Brief*, p. 3.

12 CIMM, *Evidence*, 1 February 2022, 1145 (Larissa Bezo).

13 Immigration, Refugees and Citizenship Canada (IRCC), “[Temporary resident programs and volumes](#),” 2020 *Annual Report to Parliament on Immigration*.



need to put in a “greater effort to attract brightest minds.”<sup>14</sup> According to a brief citing a 2020 OECD study, the overall number of “students in higher education mobility programs” has grown on average by 4.8% annually between 1998 and 2018.<sup>15</sup> This increase in global international student mobility, as noted by Pirita Mattola, Manager, International Student and Study Abroad Centre, University of Saskatchewan, may have an impact on Canada:

In the past, there may have been a perception that higher education in Canada is an inelastic good, meaning that cost increases or complex immigration requirements will not have a significant impact on global demand. The appeal of the country and quality education have been sufficient in attracting international students [to Canada]. In the future, however, the regionalization of international education, increasing global competition and geopolitical factors may have an impact on Canada as an international education destination.<sup>16</sup>

Alain-Sébastien Malette, Associate Vice-President, International, University of Ottawa, also noted that the future mobility of international students to Canada will be influenced by “profound changes” that are occurring in different regions, such as demographic changes. He reminded the Committee that “[m]ore than half of the world's projected population growth by 2050 will be in Africa.”<sup>17</sup> Paulin Mulatris, Professor, Université de l'Ontario français, added that international students can be ambassadors of Canadian culture and values as “they are being called upon to play a key role in this time of [socio-political] transition” within their region of French-speaking Africa.<sup>18</sup>

Some of Canada’s competition for international students includes the United States, the United Kingdom, Australia, France, Belgium, Switzerland and Germany.<sup>19</sup> Alain-Sébastien Malette mentioned that “the competition is also coming from non-traditional destinations, namely China, Russia, Malaysia and India.”<sup>20</sup> In addition, the Committee learned that these countries, in comparison to Canada, “spend vastly larger sums on marketing their brands” to attract international students.<sup>21</sup>

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14 CIMM, [Evidence](#), 1 February 2022, 1200 (Paul Davidson).

15 Université Laval, [Brief](#), p. 8.

16 CIMM, [Evidence](#), 10 February 2022, 1115 (Pirita Mattola).

17 CIMM, [Evidence](#), 10 February 2022, 1215 (Alain-Sébastien Malette).

18 CIMM, [Evidence](#), 10 February 2022, 1115 (Paulin Mulatris, Professor, Université de l'Ontario français).

19 CIMM, [Evidence](#), 1 February 2022, 1205 (Paul Davidson); 1205 (Francis Brown Mastropaolo); CIMM, [Evidence](#), 10 February 2022, 1215 (Alain-Sébastien Malette).

20 CIMM, [Evidence](#), 10 February 2022, 1215 (Alain-Sébastien Malette).

21 CIMM, [Evidence](#), 1 February 2022, 1205 (Paul Davidson); 1205 (Francis Brown Mastropaolo).

As mentioned by Carole St. Laurent, Associate Vice-President, International, at Kwantlen Polytechnic University, when it comes to international students taking the place of domestic students,

[t]hat's something that, as an institution, we need to ensure does not happen. We're seeing our domestic population gradually decrease. We're replacing that with international students, but by no means are we to displace domestic students for international students.<sup>22</sup>

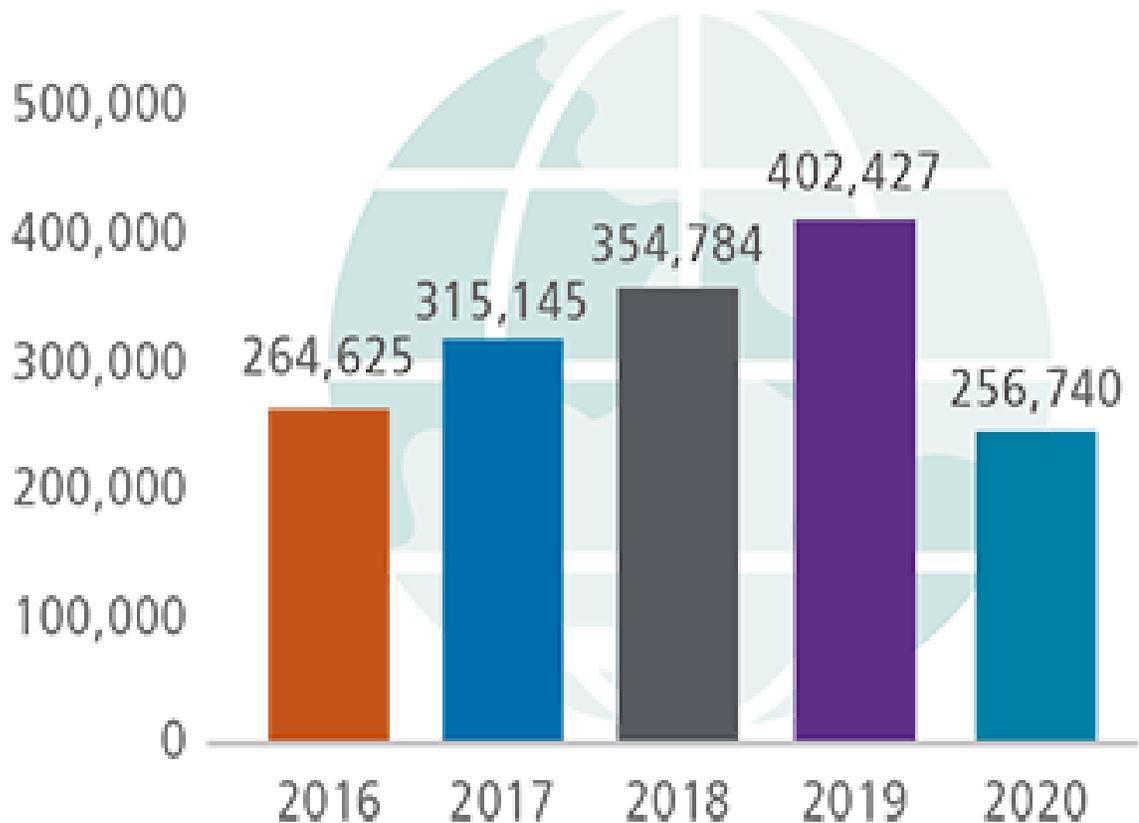
To have an idea of the magnitude of the number of international students that Canada accepts, Figure 1 presents the number of international students that have received a new study permit each year between 2016 and 2020.

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22 CIMM, *Evidence*, 10 February 2022, 1150 (Carole St. Laurent).



**Figure 1—International Students in Canada, 2016–2020  
(Number of New Study Permits Issued Each Year)**



Source: Immigration, Refugees and Citizenship Canada, [“Temporary resident programs and volumes,”](#) 2021 Annual Report to Parliament on Immigration.

It is important to note that international students may have study permits that are longer than one year, so for any given year, the number of international students in the country can be greater than the number of new study permits issued.

As seen in Figure 1, the number of study permits increased by 52% from 264,625 in 2016 to 402,427 in 2019. In 2020, “as a result of the effects of the pandemic on travel and access to services to submit required documentation for a complete application,” there were only 256,740 study permits issued, which was a 36% decrease compared to the previous year.<sup>23</sup> Preliminary data indicates that, in 2021, 447,615 study permits were

23 IRCC, [“Temporary resident programs and volumes,”](#) 2021 Annual Report to Parliament on Immigration.

issued, which represents a return to the upward trend of international students coming to Canada.<sup>24</sup>

## How Do International Students Come to Canada?

In Canada, foreign students can be enrolled in primary, secondary or post-secondary<sup>25</sup> schools. While all primary and secondary schools in Canada can enroll international students, only certain post-secondary schools have been classified as designated learning institutions (DLI) that can welcome foreign students.<sup>26</sup> The Committee's work focused on international students seeking to study in Canada's post-secondary schools in programs that are longer than six months in duration.

Foreign students who wish to study at a Canadian DLI must first apply and receive an acceptance letter from that institution<sup>27</sup> before they submit a study permit application to IRCC. After IRCC's approval, they can enroll in the study program of their choice. As noted by Francis Brown Mastropaolo, Director, International Affairs, Fédération des cégeps, "[a]lthough it is the institution's management that proceeds with the admission of students after a serious analysis, it is more often the immigration officer who pronounces on the validity of the individual's background."<sup>28</sup>

Under the 1991 *Canada–Quebec Accord Relating to Immigration and Temporary Admission of Aliens* (Canada–Quebec Accord), the provincial government's consent is required before foreign students arrive in Quebec.<sup>29</sup> Therefore, if international students wish to study in Quebec, they must also obtain a Quebec Acceptance Certificate (CAQ) issued by the Ministère de l'Immigration, de la Francisation et de l'Intégration (MIFI).<sup>30</sup> However, they do not have to wait for the actual CAQ before applying for their study

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24 Government of Canada, [Temporary Residents: Study Permit Holders—Monthly IRCC Updates - Canada - Study permit holders by country of citizenship and year in which permit\(s\) became effective](#).

25 Post-secondary schools include university, community college, collège d'enseignement général et professionnel (CEGEP), publicly funded trade or technical school, or private institutions authorized by provincial statute to confer degrees.

26 A designated learning institution is a school approved by a provincial or territorial government to host international students. For more information, see IRCC, [Designated learning institutions list](#).

27 The letter of acceptance must be issued by the Canadian institution on official letterhead, show the exact amount of tuition fees, the anticipated starting and finishing dates, and the date by which to register.

28 CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo).

29 [Canada–Québec Accord Relating to Immigration and Temporary Admission of Aliens](#), 5 February 1991.

30 Government of Québec, [Applying for temporary selection for studies](#).



permit with IRCC. They can submit the MIFI's letter of approval, or proof that they have submitted a CAQ application.<sup>31</sup>

As such, the Committee recommends:

## **Increase Dialogue between the Governments of Quebec and Canada**

### **Recommendation 1**

**That Immigration, Refugees and Citizenship Canada increase the dialogue between the Governments of Quebec and Canada to ensure that the Canada–Quebec Accord is respected on both sides, including Quebec's selection of applicants.**

### **Study Permit**

A foreign student who applies for a study permit needs to demonstrate they meet the requirements under the *Immigration and Refugee Protection Act* (IRPA) and the *Immigration and Refugee Protection Regulations* (IRPR), including having satisfactory proof of financial support.<sup>32</sup> They also need a letter of acceptance from a DLI and valid travel documents. Finally, applicants may need to do biometrics and medical exams and to submit a police certificate and language test results.

To obtain a study permit, international students can apply online or submit a paper application at a visa application centre in their country or region.<sup>33</sup> For those applying to study in Quebec and originating from countries or territories where there is a Quebec Immigration Service (SIQ), they can also apply to the SIQ directly for a CAQ.<sup>34</sup>

Because a study permit is not a visa, a foreign student will also need an Electronic Travel Authorization (eTA)<sup>35</sup> or a temporary resident visa, also known as a visitor visa, to travel

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31 IRCC, [Guide 5269 – Applying for a Study Permit outside Canada](#).

32 In Quebec, a student over the age of 18 must demonstrate they have \$13,134 per year to live. For the rest of Canada, a student must demonstrate they have \$10,000 per year. IRCC, "[Proof of financial support](#)," *Study permit: Get the right documents*, 2021. On its website, IRCC has also posted the [operational instructions and guidelines](#) used by officers during their assessment of study permits. These include instructions and guidelines about how to assess an applicant's financial sufficiency.

33 See IRCC, [Application to Study in Canada, Study Permits](#). For an overview of the questions in the application for a study permit, see, IRCC, "[Step 2. Complete the Application](#)," *Guide 5269 – Applying for a Study Permit outside Canada*.

34 IRCC, [Guide 5269 – Applying for a Study Permit outside Canada](#).

35 An [Electronic Travel Authorization](#) is an entry requirement for [visa-exempt foreign nationals](#) travelling to Canada by air.

to Canada.<sup>36</sup> However, IRCC will automatically issue the eTA or visa, as needed, when the study permit application is approved. The study permit will only be issued at the port of entry where a border officer reviews all appropriate documentation, including IRCC's letter of introduction confirming the study permit approval.

## Specific Programs

In addition to the process explained above for the International Student Program, IRCC has also, in recent years, developed specific programs to welcome more international students.

### Student Direct Stream

The Student Direct Stream (SDS) was introduced in 2018 as a streamlined and expedited application process for eligible international students. It was originally available to foreign students from China, India, the Philippines and Vietnam. In 2019, it was expanded to include Pakistan, Morocco and Senegal. In 2021, IRCC added Antigua and Barbuda, Brazil, Colombia, Costa Rica, Peru, St. Vincent and the Grenadines as well as Trinidad and Tobago.

The application for the SDS is available only online and IRCC aims to process applications within 20 calendar days.<sup>37</sup> The Committee heard that one of the main differences between the International Student Program and the SDS is the financial requirement. Namely, applicants in the SDS need to prove that they paid the tuition for their first year of study before they apply for their study permit and possess a Guaranteed Investment Certificate (GIC) of CAN\$10,000.<sup>38</sup> This financial requirement is specific to the SDS. Another difference between the International Student Program and the SDS is the required level of language test results.

Denise Amyot, President and CEO, Colleges and Institutes Canada, offered some insight to the Committee into the origins of the SDS and the related GIC. She explained that in 2008 her association and Canadian "visa officers in the field [established] a guaranteed investment certificate to demonstrate financial sufficiency and the student direct stream."<sup>39</sup> The former was established to avoid fraudulent banking and short-term loans.

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36 The [temporary resident visa](#) is an official document demonstrating that [visa-required foreign nationals](#) meet Canada's entry requirements.

37 IRCC, [Student Direct Stream: About the process](#).

38 CIMM, [Evidence](#), 8 February 2022, 1120 (Gideon Christian, President, African Scholars Initiative).

39 CIMM, [Evidence](#), 8 February 2022, 1130 (Denise Amyot, President and CEO, Colleges and Institutes Canada).



This led to the latter: a streamlined and expedited application process under the SDS. By establishing a way to demonstrate the applicant’s financial sufficiency, it reduced the verification process for visa officers and allowed them to process applications more quickly.<sup>40</sup> Denise Amyot noted that “[b]anking systems in certain countries are not as well developed, and students rely more heavily on family networks in ways that may seem atypical from a Canadian cultural lens.”<sup>41</sup>

Further, Denise Amyot recognized that

[prospective] students may not have the \$10,000 on hand right away, but their extended family, the aunts and uncles, will chip in to fund the student who is going to study in Canada. Plus, the student can work while they study. People often forget that.<sup>42</sup>

Yan Cimon, Deputy Vice Rector of External and International Affairs and Health, Director of International Affairs and La Francophonie, at Université Laval, suggested that

[o]ne solution would be for a scholarship to be considered proof that a student has the financial resources needed to come to study in Canada. It's not only scholarships; we must also make sure that research assistantships and laboratory work can also be considered proof that a student has sufficient financial resources.<sup>43</sup>

Earl Blaney, a registered immigration consultant, also argued that even with a GIC “there is no record of where these supporting funds come from, and whether the money is genuinely connected to the applicant or their sponsors— increasing the risk of money lenders (often education agents themselves) being involved.”<sup>44</sup>

Out of the 14 countries eligible in this stream, only applicants from Vietnam were negatively impacted by the SDS criteria. According to Martin Basiri, Chief Executive Officer and Co-Founder of ApplyBoard, a student recruitment and advising company, “the majority of students coming from Vietnam were coming to [their] ESL [English as a Second Language] classes because they didn’t have their IELTS [International English

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40 This additional information was submitted in a reference document that is not on the CIMM’s study webpage. Colleges and Institutes Canada, *Innovative Collaborations: Working together to promote education and strengthen the study permit application process*, p. 3.

41 CIMM, *Evidence*, 8 February 2022, 1230 (Denise Amyot).

42 *Ibid.*, 1310.

43 CIMM, *Evidence*, 10 February 2022, 1255 (Yan Cimon, Deputy Vice Rector of External and International Affairs and Health, Director of International Affairs and La Francophonie, Université Laval).

44 Earl Blaney, As an individual, *Brief*, second written submission, p. 12.

Language Testing System] 6.0 or 6.5 band score.”<sup>45</sup> After the introduction of the SDS in 2018, the visa acceptance rates from Vietnam went from 90% to about 40% because of the language requirements.

Since its inception, the SDS has been a welcomed development for many witnesses,<sup>46</sup> but several of them are calling for a further expansion – to Bangladesh<sup>47</sup> or other major African countries like Côte d'Ivoire, Ghana, Nigeria and Cameroon.<sup>48</sup> For example, H.E. Khalilur Rahman, High Commissioner of the People's Republic of Bangladesh, asked the Committee

to kindly consider Bangladesh for inclusion in the student direct stream. As I have said, a huge number of students can afford this GIC of \$10,000 Canadian. Not only that but one good thing for us, we are also very happy to inform you, is that parents in Bangladesh also think that Canada is the safest country in the world to which to send their children to study. That's why the number has overtaken those for the U.K. and the U.S.A. in recent years. But, unfortunately, because of the systemic restrictions and obstacles they are unable to come to study there.<sup>49</sup>

He added that the expansion of SDS to Bangladesh “will help our women students a lot because really our women students feel safe studying in Canada.”<sup>50</sup>

The Minister of Immigration, Refugees and Citizenship and department officials are considering the benefits of the SDS and, in order to facilitate “the process of applying to become an international student in Canada,”<sup>51</sup> “are actively looking at” its expansion.<sup>52</sup>

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45 CIMM, [Evidence](#), 8 February 2022, 1305 (Martin Basiri, Chief Executive Officer and Co-Founder of ApplyBoard).

46 CIMM, [Evidence](#), 3 February 2022, 1150 (Jared Maltais, Interim Executive Director, Canadian Alliance of Student Associations); CIMM, [Evidence](#), 8 February 2022, 1305 (Martin Basiri); CIMM, [Evidence](#), 10 February 2022, 1215 (Alain-Sébastien Malette).

47 CIMM, [Evidence](#), 8 February 2022, 1130 (Khalilur Rahman, High Commissioner for the People's Republic of Bangladesh); CIMM, [Evidence](#), 10 February 2022, 1120 (Pirita Mattola).

48 CIMM, [Evidence](#), 10 February 2022, 1245 (Alain-Sébastien Malette).

49 CIMM, [Evidence](#), 8 February 2022, 1130 (Khalilur Rahman).

50 Ibid., 1140.

51 CIMM, [Evidence](#), 17 February 2022, 1105 (Hon. Sean Fraser, Minister of Immigration, Refugees and Citizenship).

52 CIMM, [Evidence](#), 17 February 2022, 1215 (Marian Campbell Jarvis, Senior Assistant Deputy Minister, Strategic and Program Policy, Department of Citizenship and Immigration).



Based on the testimony and considering the success of the Student Direct Stream, the Committee recommends:

## **Review and Expand the Student Direct Stream**

### **Recommendation 2**

**That Immigration, Refugees and Citizenship Canada review the Student Direct Stream, its criteria and its fair applicability across different countries and expand the Student Direct Stream to other countries in Africa, such as Nigeria and Ghana, including Francophone nations, and Asia, such as Bangladesh.**

### **Explore Alternative Mechanisms for the Validation of Financial Information**

### **Recommendation 3**

**That Immigration, Refugees and Citizenship Canada, in light of the testimony highlighting the challenges surrounding the validation of financial information of prospective international students, explore alternative mechanisms to perform this validation; and that the Government of Canada encourage the expansion of partnerships between Canadian and international financial institutions.**

## **Nigeria Student Express**

The Nigeria Student Express (NSE) was introduced in 2019 as a pilot program to streamline and expedite the application process for eligible international students from Nigeria. During its study, the Committee noticed that this program is currently not found online on IRCC's website.

Gideon Christian, President, African Scholars Initiative, provided to the Committee, as contextual information, documents received through an Access to Information and Privacy (ATIP) request. In these documents, IRCC indicates "that the NSE 'is a pilot initiative aimed at improving processing times for study permit applicants in Nigeria. The initiative aims to improve processing times for students by giving them the option to use a secure financial verification system.'"<sup>53</sup>

Again, one of the main differences among the International Student Program, the SDS and the NSE is the financial requirement. Under the NSE, "the applicant is required to

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53 African Scholars Initiative, "Exhibit 5: Letter to the Hon. Sean Fraser, Minister of Immigration, Refugees and Citizenship Re: Concerns Relating to the Processing of Canadian Study Permit Applications from Nigeria," *Brief*, p. 59.

produce a bank statement showing the existence of ‘the equivalent of 30,000 Canadian dollars for at least 6 months’” in the last year.<sup>54</sup> Witnesses believe that this financial requirement should be reviewed or harmonized with the other programs for international students.<sup>55</sup>

The Minister informed the Committee that the financial requirements under the NSE equate to

a lower total than students from other nations are required to provide. Though it’s \$10,000, they also need to make good on proof of funds for the cost of their tuition, the average of which ... is a total of \$43,000. However, the issue is that we don’t necessarily have financial partners on the ground in Nigeria, so having the proof of funds of \$30,000 is more equitable when you look across the requirements in other countries, where you have not only \$10,000, but also the proof of funds to cover the cost of an international student’s tuition.<sup>56</sup>

Notwithstanding that fact, Gideon Christian noted that “[t]he applicant from Nigeria is required to show proof of funds that are three times more than those of the applicant from the SDS countries, and yet, when this applicant overcomes this high burden of proof, most of the study visa applications from Nigeria are still refused.”<sup>57</sup>

Another difference that Gideon Christian pointed out is that some students are asked to complete language tests. He asserted that this is unfair based on the fact that “Nigeria is an English language speaking country” and that “all institutions of higher learning in Canada exempt admission applicants from Nigeria from the requirements for English language proficiency examinations.”<sup>58</sup> He believes that “the language proficiency requirement imposed by the visa offices is not in any way related to or necessary for the expedited processing of study permit applications from Nigeria” and that “the requirement exudes stereotypes and racism.”<sup>59</sup>

Considering the Nigeria Student Express is an ongoing pilot program, the Committee recommends:

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54 CIMM, [Evidence](#), 8 February 2022, 1120 (Gideon Christian).

55 Ibid., 1150; CIMM, [Evidence](#), 10 February 2022, 1245 (Alain-Sébastien Malette).

56 CIMM, [Evidence](#), 17 February 2022, 1130 (Hon. Sean Fraser).

57 CIMM, [Evidence](#), 8 February 2022, 1120 (Gideon Christian).

58 African Scholars Initiative, “Exhibit 5: Letter to the Hon. Sean Fraser, Minister of Immigration, Refugees and Citizenship Re: Concerns Relating to the Processing of Canadian Study Permit Applications from Nigeria,” [Brief](#), p. 59.

59 Ibid., p. 60.



## **Review the Criteria of the Nigeria Student Express Program**

### **Recommendation 4**

**That Immigration, Refugees and Citizenship Canada review the criteria for the Nigeria Student Express program, reconsider its financial requirements in light of other existing programs for international students, such as the Student Direct Stream, and remove the English language proficiency requirement for Nigerian students in order to ensure a fairness of requirements across programs.**

Through its work, the Committee found that information was not readily available for the NSE pilot program. The Committee noted that there were inconsistencies in the financial requirements between the Student Direct Stream and Nigeria Student Express.

To ensure more transparency, the Committee recommends:

### **Publish Information about the Nigeria Student Express Program**

#### **Recommendation 5**

**That Immigration, Refugees and Citizenship Canada publish on its website information about the Nigeria Student Express pilot program and its criteria to better inform prospective international students, Canadian educational institutions and other partners in the international education sector.**

## **Francophone Immigration Strategy**

Throughout its study, the Committee heard of the overall importance of francophone international students.<sup>60</sup> Several witnesses spoke about the importance of Africa to the Francophonie, partly because “the proportion of francophones in the world living in sub-Saharan Africa could increase from 44% to 85% by 2050.”<sup>61</sup> However, the Committee heard that even though nationals from the African continent represent the future of francophone communities in Quebec and in the rest of Canada, African international students have great difficulty coming to study in Canada and may be tempted to go

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60 CIMM, *Evidence*, 10 February 2022, 1125 (Paulin Mulatris); 1205 (Luc Bussi eres, Rector, Hearst University); 1210 (Yan Cimon); 1215 (Alain-S ebastien Malette).

61 CIMM, *Evidence*, 10 February 2022, 1125 (Paulin Mulatris); 1215 (Alain-S ebastien Malette); CIMM, *Evidence*, 3 February 2022, 1200 (Alain Dupuis, Director General, F ed eration des communaut es francophones et acadienne du Canada).

elsewhere,<sup>62</sup> such as France, which is a big competitor to Canada in terms of attracting francophone students due to its “powerful brand and historic roots.”<sup>63</sup> Université Laval also noted that

France is an interesting model that seeks to simplify students’ arrival by facilitating access to a study visa. In doing so, it has risen to the top of the list of countries that welcome international students from La Francophonie. Several other countries are also undertaking reforms to reduce migration barriers.<sup>64</sup>

The Minister recognized that foreign students “strengthen our ongoing efforts to reach the target of 4.4% French-speaking immigrant admissions [outside of Quebec] by 2023,”<sup>65</sup> speaking in reference to his department’s Francophone Immigration Strategy.<sup>66</sup> He explained that the overall goal of this strategy is “to increase opportunities for French-speaking and bilingual newcomers to settle in and contribute to our communities throughout the country.”<sup>67</sup> In addition to the federal government’s efforts, several “jurisdictions have a francophone target or a provincial nominee program stream specifically dedicated to attracting francophone and bilingual talent.”<sup>68</sup> Therefore, IRCC tries to specifically target French-speaking international students to inform of them of the “federal, provincial and territorial immigration programs and the services for which they are they are eligible.”<sup>69</sup>

For Alain Dupuis, Director General, Fédération des communautés francophones et acadienne du Canada, the Francophone Immigration Strategy is in line with IRPA’s objectives, which aim to support the development and vitality of Canada’s communities. However, he contextualized the strategy and IRCC’s efforts:

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62 CIMM, *Evidence*, 10 February 2022, 1210 (Yan Cimon).

63 CIMM, *Evidence*, 1 February 2022, 1205 (Paul Davidson).

64 Université Laval, *Brief*, p. 8.

65 CIMM, *Evidence*, 17 February 2022, 1105 (Hon. Sean Fraser).

66 IRCC, *Meeting Our Objectives: Francophone Immigration Strategy*, 2019. This strategy is part of the Government of Canada’s efforts to support the vitality of Francophone minority communities outside Quebec and English-speaking communities in Quebec. Its role in immigration and integration in Quebec is set out in the *Canada–Québec Accord relating to Immigration and Temporary Admission of Aliens*.

67 CIMM, *Evidence*, 17 February 2022, 1105 (Hon. Sean Fraser).

68 *Ibid.*, 1105.

69 IRCC, *Meeting our objectives: Francophone Immigration Strategy*, 2019.



In 2003, the federal government set a target of 4.4% of immigrants admitted outside Quebec being French-speaking and settling in our communities. The government has never succeeded in reaching that target. According to the Commissioner of Official Languages, if Canada had given itself the tools to do so, it could have welcomed 76,000 French-speaking immigrants outside Quebec since 2008. In fact, the demographic weight of the Canadian Francophonie dropped from 4.4% in 2001 to less than 3.8% in 2016. If that trend continues, Statistics Canada estimates that this proportion will fall to 3.1% by 2036.<sup>70</sup>

The Minister reassured the Committee that IRCC is now “actively pursuing ... the 4.4% target for French-speaking immigrants outside of Quebec”<sup>71</sup> through targeted measures, including expanding the SDS in countries such as Morocco and Senegal. He remarked that “[i]n 2020, French-speaking admissions represented 3.6% of all immigrants admitted to Canada outside Quebec, in comparison with 2.8% in 2019.”<sup>72</sup> This increase should continue into 2021 in part due to the “uncapped stream for French-speaking essential workers and students in [the 2021] temporary resident to permanent resident program, which resulted in 7,000 applications.”<sup>73</sup>

Despite these efforts, witnesses said that francophone international students, especially from francophone Africa, still face many obstacles, further outlined below, when trying to come to Canada. Alain Dupuis stated that, based on the high refusal rates from the region, it is as if “we are closing the doors to them,” even if it is contrary to our policies.<sup>74</sup>

The Minister insisted that “international students are excellent candidates for permanent residency. We have increased our targeted efforts overseas to promote and attract francophone students and immigrants to Canada.”<sup>75</sup> However, witnesses to the Committee also noted the discrepancy between the recruitment of international students with a desire to seek permanent residency and the commonly given reason for refusal that IRCC does not believe that the student will return to their own country upon completion of their studies. Shamira Madhany, Managing Director, Canada and Deputy Executive Director, World Education Services, referred to the government’s approach to

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70 CIMM, [Evidence](#), 3 February 2022, 1200 (Alain Dupuis).

71 CIMM, [Evidence](#), 17 February 2022, 1105 (Hon. Sean Fraser).

72 Ibid.

73 Ibid.

74 CIMM, [Evidence](#), 3 February 2022, 1200 (Alain Dupuis).

75 CIMM, [Evidence](#), 17 February 2022, 1105 (Hon. Sean Fraser).

“dual intent” as a “catch-22 situation” that forces students to decide whether to lie on their application or tell the truth and be rejected.<sup>76</sup>

As such, the Committee recommends:

### **Reduce High Refusal Rates for Student Visas to Meet Francophone Immigration Targets and Address the Labour Shortage**

#### **Recommendation 6**

**That Immigration, Refugees and Citizenship Canada provide a comprehensive plan on how to reduce the high rates of refusal for student visas, in order to help meet francophone immigration targets and address the labour shortage in Canada, including in Quebec.**

### **Recruitment Efforts**

Overall, at the federal level, Global Affairs Canada (GAC) is responsible for promoting the Canadian educational sector abroad through the recruitment of international students, the “development of partnerships, and the sale/licensing of Canadian education services abroad.”<sup>77</sup> Provinces, territories as well as education institutions and associations might have their own promotion and recruitment strategies<sup>78</sup> to inform their recruiting missions overseas.<sup>79</sup> They often partner with GAC to reach specific regions or populations of foreign students.

To frame its recruitment efforts, in August 2019, the federal government adopted an International Education Strategy (IES) for 2019–2024. This strategy aims “to maintain

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76 CIMM, *Evidence*, 1 March 2022, 1115 (Shamira Madhany, Managing Director, Canada and Deputy Executive Director, World Education Services).

77 Global Affairs Canada (GAC), *Evaluation of Canada’s International Education Strategy*, February 2019. The International Education Division and the Trade Commissioner Service lead the international education files at GAC. For an example of Canada’s recruitment efforts, see GAC, *Canada Shines as an Education Superpower During Expo’s Knowledge & Learning Week*, News release, 7 December 2021.

78 For examples, see CIMM, “*D. International students*,” *Immigration to Atlantic Canada: Moving to the Future*, 1st session, 42nd Parliament, November 2017; Colleges and Institutes Canada, “*Student Recruitment*,” *International Partnerships*.

79 Le Québec c’est nous aussi, *Brief*, p. 7.



and enhance Canada’s standing as a high-calibre place to study, do research and work”<sup>80</sup> by pursuing three key objectives:

- Encourage Canadian students to gain new skills through study and work abroad opportunities in key global markets, especially Asia;
- Diversify the countries from which international students come to Canada, as well as their fields, levels of study, and location of study within Canada; and
- Increase support for Canadian education sector institutions to help grow their export services and explore new opportunities abroad.<sup>81</sup>

The Committee recommends:

### **Issue Directive with Respect to Francophone Immigration**

#### **Recommendation 7**

**That Immigration, Refugees and Citizenship Canada issue to all Canadian visa offices a directive reminding them of the federal government’s obligations with respect to francophone immigration.**

As part of its IES, the federal government offers a variety of scholarships, fellowships and funding opportunities to international students who wish to study or conduct research in Canada. Some provinces and territories also offer scholarships for international students.<sup>82</sup>

In addition, one IRCC official informed the Committee that, as part of its Francophone Immigration Strategy, the department, through its overseas missions, promotes Canada as a study and work destination, focusing on francophone source countries, at the Destination Canada fair. This annual event has been organized since 2003 and aims to

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80 ÉduCanada, *Building on Success: Canada’s International Education Strategy (2019-2024)*, News release, 23 August 2019.

81 International Education, “[Elements of the new International Education Strategy](#),” *Building on Success: International Education Strategy (2019–2024)*, 2019. To achieve these objectives, the federal government allocated in its 2019 budget \$147.9 million over five years, followed by \$8 million per year of ongoing funding.

82 ÉduCanada, [International scholarship opportunities for non-Canadians](#). According to Francis Brown Mastropaolo, from the Fédération des cégeps, Quebec “invests close to \$15 million in attraction measures and scholarships for international students at the CEGEP level alone.” CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo).

attract newcomers, including foreign students, to Canada's francophone communities.<sup>83</sup> However, Alain Dupuis disagreed with this portrayal and told the Committee that Canada does not have a "promotion and recruitment strategy for French-speaking countries in general, [and] that's especially true for Africa."<sup>84</sup> He recommended to the Committee a strategy specifically targeting international students in French-speaking Africa, but also a global recruitment strategy that has the adequate resources to promote immigration.<sup>85</sup>

While Canada has an international student strategy, it seems to be poorly applied and to provide conflicting messaging, which has a significant impact on foreign students' applications. As explained by Carole St. Laurent, who attended many recruitment events, there is a disconnect between GAC and IRCC in regard to the recruitment of international students. She told the Committee that "[i]t makes absolutely zero sense" that, on the one hand, GAC is investing a lot of money in recruiting, and telling prospective international students to come study in Canada to pursue opportunities to grow and even settle in the country, while, on the other hand, IRCC refuses the study permits of international students who mentioned their intention to stay and remain in Canada after their studies.<sup>86</sup> Other witnesses also argued for a "consistent national message about the desire to immigrate and the desire to study"<sup>87</sup> that allows Canada to re-establish its brand as a study destination of choice.<sup>88</sup>

The unintended consequence of this conflicting messaging is that prospective international students seeking to study in Canada may hire recruitment agents to get advice and assistance with their applications. Shamira Madhany referenced a 2021 study by ICEF Monitor, a global organization that supports global student mobility, which estimated that almost 50% of international students who come to Canada are referred by a recruitment agent.<sup>89</sup> Wei William Tao, Canadian immigration lawyer, noted that

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83 CIMM, [Evidence](#), 17 February 2022, 1245 (Corinne Prince, Acting Assistant Deputy Minister, Settlement and Integration, Department of Citizenship and Immigration).

84 CIMM, [Evidence](#), 3 February 2022, 1230 (Alain Dupuis).

85 Ibid.

86 CIMM, [Evidence](#), 10 February 2022, 1155 (Carole St. Laurent).

87 CIMM, [Evidence](#), 10 February 2022, 1220 (Yan Cimon); CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo).

88 CIMM, [Evidence](#), 1 February 2022, 1205 (Francis Brown Mastropaolo); CIMM, [Evidence](#), 3 February 2022, 1210 (Martin Normand, Director, Strategic Research and International Relations, Association des collèges et universités de la francophonie Canadienne).

89 CIMM, [Evidence](#), 1 March 2022, 1115 (Shamira Madhany).



[w]ith high refusal rates, Agents (recruiters) abroad are emboldened by the lack of regulation on student recruitment and educational consulting. They provide low or free of charge legal services (often advising and offshoring profits overseas, beyond the reach of Canadian regulations) while collecting tens of thousands of dollars off their work, no oversight. One should not be surprised that issues such as family separation, mental health crises, increasing narratives of suicide, and families abroad losing their entire life savings to try and sponsor a family member's education in Canada. We are complicit in the harms this system has created.<sup>90</sup>

Shamira Madhany and other witnesses warned the Committee that, unfortunately, international students often have inaccurate or missing information from recruitment agents, which affects their applications.<sup>91</sup> Shamira Madhany recommended that the federal government provide more accurate information at the recruitment stage. François Dornier, Chairman of the Board, Réseau des cégeps et des collèges francophones du Canada, agreed and suggested that IRCC organize information sessions, such as webinars, with its partners in Africa and the Caribbean to better inform prospective international students of the necessary requirements. This would, in his opinion, ease the application process for all parties involved and prevent the possibility of fraud.<sup>92</sup>

Witnesses also recommended that the federal government encourage provinces to regulate the educational service provider industry and protect international students from recruitment agents in Canada and abroad; Manitoba introduced legislation to this effect in 2016.<sup>93</sup> Shamira Madhany argued that this “will enable prospective international students to access accurate information and reduce fraudulent activities.”<sup>94</sup> This last recommendation echoes another proposed by a witness who suggested establishing a link between education agents and licensed immigration service providers to improve the quality of applications being sent to IRCC.<sup>95</sup>

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90 Wei William Tao, As an individual, *Brief*, p. 10.

91 CIMM, *Evidence*, 1 March 2022, 1115 (Shamira Madhany); Wei William Tao, *Brief*, p. 9; Le Québec c'est nous aussi, *Brief*, p. 10; Canadian Association of University Teachers, *Brief*, p. 2.

92 CIMM, *Evidence*, 1 March 2022, 1120 (François Dornier).

93 Shamira Madhany, *Brief*, p. 3; Ontario Council of Agencies Serving Immigrants, *Brief*, p. 2; Canadian Association of University Teachers, *Brief*, p. 2. See Government of Manitoba, *The International Education Act C.C.S.M. c. 175*.

94 Shamira Madhany, *Brief*, p. 3.

95 Earl Blaney, *Brief*, p. 2.

Similarly, the Committee heard that more communication among Canadian DLIs, prospective international students and visa officers would be beneficial and ease the application process. This would allow DLIs to clarify their recruitment efforts with visa officers and to provide additional information about a prospective student's application.<sup>96</sup>

Considering Canada's efforts to strengthen its international student recruitment efforts, the Committee recommends:

### **Promote Canada as a Study Destination**

#### **Recommendation 8**

**That the Government of Canada, provinces and territories, and designated learning institutions work together to find new and innovative ways to better promote Canada as a study destination for international students, and for the purposes of retention put special consideration on how to better inform French-speaking prospective students about the opportunities to study in French outside of Quebec.**

### **Regulate the Educational Service Provider Industry**

#### **Recommendation 9**

**That Immigration, Refugees and Citizenship Canada work with provincial and territorial counterparts, as well as Canadian designated learning institutions, to regulate recruiters in the international educational sector, and ensure that the information packages provided to these recruiters include information on how student applicants can safeguard themselves against fraud.**

### **Ensure Simple, Accurate and Coherent Information is Available**

#### **Recommendation 10**

**That Immigration, Refugees and Citizenship Canada ensure that simple and accurate information about applications is always available, and that Global Affairs Canada and**

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96 CIMM, *Evidence*, 1 March 2022, 1110 (François Dornier). It should be noted that designated learning institutions have an established communication portal with IRCC for their biannual compliance reports, but that applies only once international students are enrolled. See IRCC, *Designated Learning Institution Portal: Compliance Reporting*.



**Immigration, Refugees and Citizenship Canada are always presenting consistent information.**

## **CHAPTER 2: THE REALITY OF HIGH REFUSAL RATES**

Chapter 2 summarizes the data the Committee received regarding processing times and refusal rates. But, first, it gives an overview of the current reality faced by international students and Canadian designated learning institutions who are affected by these refusal rates—refusal rates that are generally high.

### **Experiences of High Refusal Rates**

Throughout its study, the Committee heard many witnesses speak to the impact of IRCC’s refusal rates for study permits on individuals’ lives, institutions’ resources, and communities. These witnesses also highlighted that refusal rates are high. As expressed by Larissa Bezo:

Because each rejection letter is not only personally devastating for the student who has successfully qualified for admission to a Canadian institution, each rejection also arguably represents a failure of process, a waste of resources for the student and the host institution, a loss of opportunity for the community where the student planned to study, and fewer chances to leverage the people-to-people ties.<sup>97</sup>

To share a student’s perspective, a witness provided the example of Amina (a pseudonym for a typical student from francophone Africa) from Cameroon. After “10 months of her year convincing her parents, gathering some extra funds, preparing for her stay and obtaining a scholarship, [she] has to abandon her plans [to study in Canada] and she does not really understand why [she got refused].”<sup>98</sup> Denise Amyot told the Committee that this story is not unique. “We’re hearing more and more stories of qualified students waiting several months for a decision on their study permit only to have it rejected, often for unclear and unfounded reasons.”<sup>99</sup>

Yan Cimon called on IRCC to “stop wasting talent and damaging Canada’s reputation in Africa.”<sup>100</sup> Like other representatives from Canadian learning institutions, he shared with the Committee the difficulties in getting the international students they admit to their

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97 CIMM, *Evidence*, 1 February 2022, 1145 (Larissa Bezo).

98 CIMM, *Evidence*, 1 February 2022, 1220 (Francis Brown Mastropaolo).

99 CIMM, *Evidence*, 8 February 2022, 1230 (Denise Amyot).

100 CIMM, *Evidence*, 10 February 2022, 1215 (Yan Cimon).

programs to land in Canada. There are often delays and increasing study permit refusals, particularly in francophone Africa.<sup>101</sup> The impact of high refusal rates is evident throughout the sector. For instance, Paulin Mulatris, from the Université de l'Ontario français, summarized the impact high refusal rates on his newly established post-secondary institution for the Committee:

this year's refusal rate was almost 75%. ... Many applicants, about 30%, never even got a response [from IRCC]. We sent emails to our candidates to see what was happening, and 30% of them said they had never received any response from the application processing centre. We therefore assumed they had been rejected. ... I would say that the repercussions for an institution like ours are huge, and they will stay that way until this problem is taken seriously.<sup>102</sup>

For other institutions, hosting international students provides greater financial flexibility and, sometimes, even ensures the survival of institutions in certain regions.<sup>103</sup> Thus, the lack of foreign students is deeply felt through host communities and by domestic students who might not access certain programs because of enrollment issues.<sup>104</sup>

With the COVID-19 pandemic, Le Québec c'est nous aussi noted that

IRCC therefore changed course and introduced a two-stage process. This allowed international students to begin their studies (and pay their tuition fees) at the institution to which they had been accepted, while their study permit applications were being processed. They did so virtually, from their home countries. However, once those students had begun their studies, if their study permit applications were refused ... not only could they clearly not continue their studies, but they also were not entitled to a reimbursement.<sup>105</sup>

To mitigate some of this impact during the pandemic, certain institutions changed their delivery model from completely in person to a hybrid of virtual and in person to accommodate students, domestic or international, who wished to pursue their studies remotely. This also allowed certain international students who had not received their study permits, due to delays or a refusal, to pursue their education from abroad. While witnesses recognized this was not a favourable outcome for anyone, they reassured the

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101 Ibid., 1235; CIMM, *Evidence*, 1 March 2022, 1110 (François Dornier).

102 CIMM, *Evidence*, 10 February 2022, 1135 (Paulin Mulatris).

103 CIMM, *Evidence*, 1 March 2022, 1110 (François Dornier).

104 CIMM, *Evidence*, 1 February 2022, 1250 (Paul Davidson).

105 Le Québec c'est nous aussi, *Brief*, p. 13.



Committee that international students would receive their credentials even if they were not in Canada.<sup>106</sup> In some cases, that was a problem because students had requested to be reimbursed and it was no longer possible to do so as “they had already completed a full program from an academic perspective.”<sup>107</sup>

As such, the Committee recommends:

### **Standardize Tuition Reimbursement Policies**

#### **Recommendation 11**

**That Immigration, Refugees and Citizenship Canada promote standardizing tuition reimbursement policies for Canadian and Quebec universities and institutions when an individual’s study permit application is refused.**

### **Student Permit Data**

Available student permit data supports witness accounts: some students, and some groups of students, experience long waits for study permits and high refusal rates.

### **Processing Times**

Preliminary internal IRCC data indicates long delays for some students in receiving study permits – delays that may force students to abandon or defer their studies. IRCC’s service standard for processing a student permit is 60 days.<sup>108</sup> Its target is to process 80% of submitted applications within this standard. During the 2019–20 fiscal period, the department reached its service standards for 94% of study permit applications submitted from outside Canada.<sup>109</sup> The average processing time was 38 days, well within this standard.<sup>110</sup>

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106 CIMM, *Evidence*, 10 February 2022, 1200 (Carole St. Laurent); 1240 (Alain-Sébastien Malette).

107 CIMM, *Evidence*, 8 February 2022, 1255 (Andrew Champagne, Manager, Mobility Programs, Colleges and Institutes Canada); Le Québec c’est nous aussi, *Brief*, p. 14.

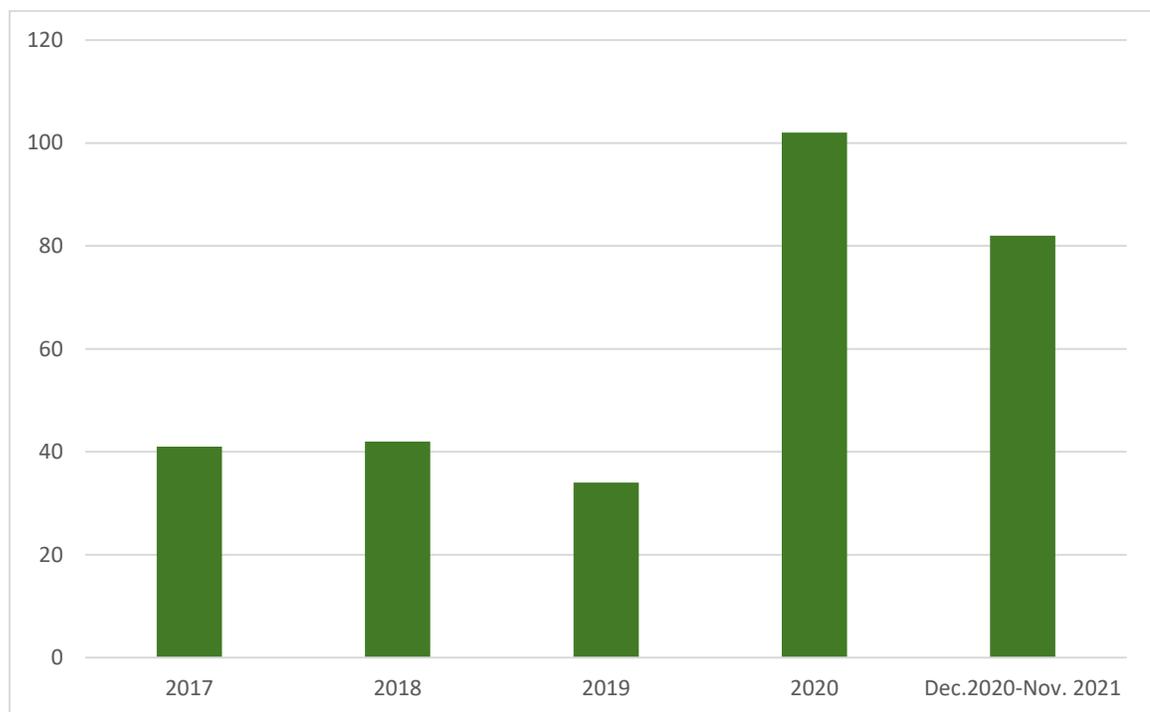
108 Sessional Paper 8555-441-97, *Q-97*, asked by Alexis Brunelle-Duceppe (Lac-Saint-Jean), 25 November 2021, Annex B (part c).

109 IRCC, *Immigration, Refugees and Citizenship Canada service standards*.

110 Sessional Paper 8555-441-97, *Q-97*, asked by Alexis Brunelle-Duceppe (Lac-Saint-Jean), 25 November 2021, Annex B (part c).

Since the beginning of the pandemic, however, average processing times have increased greatly. During 2020, study permits took an average of 102 days to be processed. For the period from December 2020 to November 2021, the wait time decreased to 82 days (see Figure 2). On 31 January 2022, the Minister committed that IRCC would return to its 60-day processing standards by the end of 2022.<sup>111</sup>

**Figure 2—Processing Times of Student Permit Applications, 2017—November 2021, in Days**



Source: Figure prepared by the authors using data from Sessional Paper 8555-441-97, [Q-97](#), asked by Alexis Brunelle-Duceppe (Lac-Saint-Jean), 25 November 2021, Annex B (part c).

Figures supplied by witnesses highlight the fact that some student applicant populations experience longer delays than others. For instance, Memorial University noted that its Faculty of Education “has observed that [students from] some regions such as Nigeria and Afghanistan had a real-time study permit processing time of nearly 30+ weeks at the height of the pandemic.”<sup>112</sup> The Grenfell campus of Memorial University also noted that students from Nigeria, Bangladesh and Pakistan are most affected by permit delays, and

111 IRCC, [Modernizing Canada’s immigration system to support economic recovery and improve client experience](#), News release, 31 January 2022.

112 Memorial University of Newfoundland, [Brief](#), p. 3.



its Marine Institute noticed long delays for Nigerian applicants.<sup>113</sup> Carole St. Laurent noted that her university received “a pretty significant approval rate for Indian students, in excess of 80%, but there are really significant delays in the approval process.”<sup>114</sup> Some DLIs also recorded consequences of these delays. For instance, the University of Regina noted that “[a]s part of the ... Winter 2022 intake ... more than 100 students dropped their courses because they were waiting to have their study permit applications processed.”<sup>115</sup>

To better understand and mitigate the affect of systemic processing delays for applicants from different countries, the Committee recommends:

### **Provide Data on Study Permit Processing Times**

#### **Recommendation 12**

**That Immigration, Refugees and Citizenship Canada provide data on study permit processing times and reasons for refusal, broken down by applicants’ country of origin and other available demographic variables, in the department’s Annual Report to Parliament on Immigration.**

### **Refusal Rates**

While IRCC has issued increasing numbers of study permits from 2016 to 2020, some witnesses highlighted that the overall refusal rate has also increased during this period.<sup>116</sup> Where IRCC refused 31% of all applications in 2016 and 34% in 2017, the department refused 40% in 2019 and 49% in 2020 (Figure 3). As Larissa Bezo estimated the effect of these high rates and high number of applications, “we are speaking about a half a million rejections since 2016. This is a very substantive number of prospective individuals.”<sup>117</sup> IRCC data indicates a return to a 40% refusal rate for 2021.

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113 Ibid.

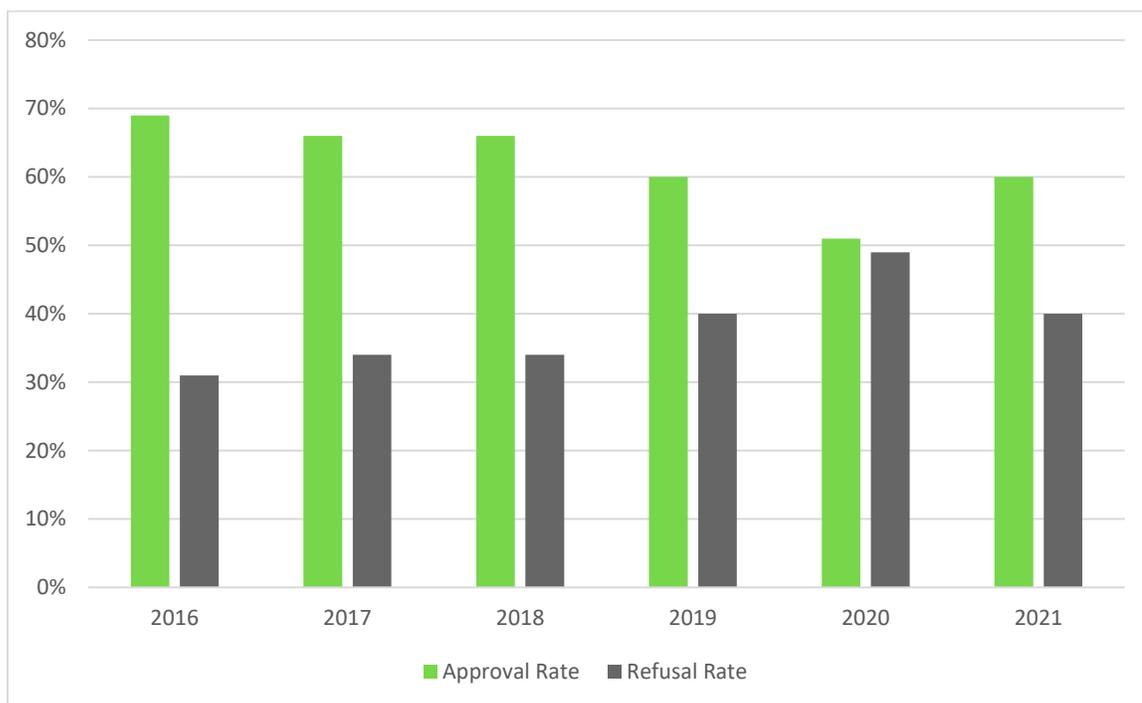
114 CIMM, *Evidence*, 10 February 2022, 1155 (Carole St. Laurent).

115 University of Regina, *Brief*.

116 Université Laval, *Brief*, p. 5; CIMM, *Evidence*, 1 February 2022, 1145 (Larissa Bezo).

117 CIMM, *Evidence*, 1 February 2022, 1230 (Larissa Bezo).

**Figure 3—Acceptance and Refusal Rates of Study Permit Applications, 2016–2021**



Source: Figure prepared by the authors using data from Immigration, Refugees and Citizenship Canada (IRCC), *CIMM 7.3 Rate of acceptance for student visas and permits*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 28 mars 2022, p. 1.

### Differences by Country of Origin

Notwithstanding the recent decrease in refusal rates, these rates have been higher for applicants in some parts of the world than for applicants elsewhere. Witness testimony and data confirm high refusal rates particularly for students from francophone Africa and Africa, more broadly.

#### *Africa and Francophone Africa*

Many witnesses highlighted high refusal rates for their institutions for students from African countries with significant French-speaking populations.<sup>118</sup> Universities Canada

118 CIMM, *Evidence*, 1 February 2022, 1145 (Larissa Bezo); CIMM, *Evidence*, 1 February 2022, 1200 (Paul Davidson); CIMM, *Evidence*, 1 February 2022, 1150, 1210 (Francis Brown Mastropaolo); Le Québec c'est nous aussi, *Brief*, p. 15; CIMM, *Evidence*, 3 February 2022, 1120 (Christian Fotang).



indicated that undergraduate refusal rates for students from Morocco and Senegal were 45% and 80% in 2019.<sup>119</sup> Addressing rates of students applying to CEGEPs, Francis Brown Mastropaolo reported that, between 2015 and 2020, “the highest refusal rates observable were for applications from 13 francophone African countries. For several of these countries, refusal rates reached 80%. The regional average remained above 65%.”<sup>120</sup>

Speaking to rates for students studying in Quebec, the Quebec immigrant advocacy group, Le Québec c’est nous aussi reported that “the refusal rate for students from Algeria, the Democratic Republic of Congo, Togo, Senegal or Cameroon is about 80%.”<sup>121</sup> Indeed, it concluded that, from the vantage of 2020, the trend of refusal rates for francophone Africa “seems to be increasing since 2016.”<sup>122</sup> The brief cited IRCC data on increases in refusal rates for people applying from Algeria, Benin, Democratic Republic of Congo, Ivory Coast, Guinea and Cameroon.<sup>123</sup>

By contrast, witnesses highlighted low refusal rates from the largest recruitment pools outside of francophone Africa. Universities Canada reported that “the largest international source countries for university enrolment see an 80% approval rate, with some countries as high as 95%.”<sup>124</sup> While the brief does not name these countries, India (170,210 permits), China (56,340 permits) and France (20,205 permits) are the largest sources of study permit holders for 2021.<sup>125</sup> Francis Brown Mastropaolo highlighted that CEGEPs noted that, between 2015 and 2020, “the important recruitment pools of India and China had average refusal rates of 35% and 17% respectively.”<sup>126</sup> Le Québec c’est nous aussi similarly contrasted high and increasing refusal rates from francophone African countries with the fact that almost all applications to study in Quebec from

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119 CIMM, [Evidence](#), 1 February 2022, 1200 (Paul Davidson).

120 CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo).

121 Le Québec c’est nous aussi, [Brief](#), p. 6.

122 Ibid.; cf. IRCC Data, from ATIP Disclosure 2A-2020-91472/LG. Data presented in “Overall Study Permit Applications Approved and Refused,” Cross-Examination of Andie Melo Daponte on his affidavit dated July 29, 2021, 4 August 2021, *Abigail Ocran v. The Minister of Citizenship and Immigration*, Exhibit 1, pp. 95-115.

123 Ibid.

124 Universities Canada, [Brief](#), p. 3.

125 IRCC, [Temporary Residents: Study Permit Holders – Monthly IRCC Updates – Canada – Study permit holders by country of citizenship and year in which permit\(s\) became effective](#).

126 CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo).

France, the United Kingdom and Germany are accepted.<sup>127</sup> Francis Brown Mastropaolo summarized that “no other region in the world compares” to francophone Africa.<sup>128</sup>

Other witnesses instead contrasted refusal rates in Africa as a whole with those elsewhere, and highlighted similar refusal rates for students from all or several African countries.<sup>129</sup> Université Laval noted that, at the university, “[o]nly 20% of students from sub-Saharan Africa and 29% from North Africa obtained ... legal authorization to study in Canada in 2020.”<sup>130</sup> In comparison,

two-thirds of French applicants [from France] who accepted an offer of admission enrolled, while nearly all study permit applications were approved by ... IRCC ... [and] applicants from Asia and the United States ... have much higher study permit approval rates—55% and 96%, respectively.<sup>131</sup>

Similarly, Yan Cimon noted that applicant acceptance rates from Europe, the United States and Oceania have remained steady since 2012, in contrast to refusal rates in Africa.<sup>132</sup> Looking at refusal rates for all DLIs in all of Canada, and counting all African countries, Martin Basiri, from ApplyBoard, indicates that, between 2019 and 2021, the average francophone African refusal rate (73.4%) was similar to the average refusal rate for the rest of Africa (75%). Counting 22<sup>133</sup> African countries with significant French-speaking populations, and looking at applications throughout Canada between the periods 2016–2018 and 2019–2021, Martin Basiri measured a 2.9% increase in the refusal rates in francophone Africa. This compares to an increase of 1% in the rest of Africa.<sup>134</sup>

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127 Le Québec c’est nous aussi, *Brief*, p. 6.

128 CIMM, *Evidence*, 1 February 2022, 1150 (Francis Brown Mastropaolo).

129 Université Laval, *Brief*, pp. 4-5; CIMM, *Evidence*, 10 February 2022, 1245 (Yan Cimon); CIMM, *Evidence*, 8 February 2022, 1250 (Martin Basiri); CIMM, *Evidence*, 10 February 2022, 1120 (Pirita Mattola).

130 Université Laval, *Brief*, p. 5.

131 Université Laval, *Brief*, p. 5.

132 CIMM, *Evidence*, 10 February 2022, 1300 (Yan Cimon).

133 Martin Basiri describes francophone Africa as Algeria, Burkina Faso, Central African Republic, Republic of Chad, Comoros, Democratic Republic of the Congo, People’s Republic of the Congo, Democratic Republic of East Timor, Gabon Republic, Guinea-Bissau, Madagascar, Republic of Mali, Mauritania, Mauritius, Morocco, Peoples Republic of Benin, Republic of Djibouti, Republic of Ivory Coast, Republic of the Niger, Rwanda, Senegal, Federal Republic of Cameroon, Seychelles, Republic of Togo, and Tunisia.

134 CIMM, *Evidence*, 8 February 2022, 1250 (Martin Basiri).



**Table 1—Total Number of Study Permit Applications Refused and Processed from African Countries with Significant Anglophone Populations, 2021**

Country	Refused	Processed	Refusal Rate (%)
Botswana, Republic of	43	92	47
Egypt	488	1084	45
Ethiopia	1,431	1630	88
Eritrea	3	4	75
Ghana	3,223	3942	82
Kenya	1,653	2529	65
Lesotho	2	8	25
Liberia	94	100	94
Libya	54	93	58
Malawi	30	51	59
Namibia	23	38	61
Nigeria	12,770	19,528	65
Rwanda	1,470	1810	81
Sao Tome and Principe	2	3	67
Sierra Leone	67	73	92
Somalia, Democratic Republic of	12	15	80
South Africa, Republic of	440	1207	36
South Sudan, Republic of	5	5	100
Sudan, Democratic Republic of	57	74	77
Tanzania, United Republic of	200	440	45
Togo, Republic of	967	1108	87
Uganda	353	549	64

DIFFERENTIAL TREATMENT IN RECRUITMENT AND ACCEPTANCE RATES OF  
FOREIGN STUDENTS IN QUEBEC AND IN THE REST OF CANADA

Country	Refused	Processed	Refusal Rate (%)
Zambia	93	192	48
Zimbabwe	241	485	50
<b>Total</b>	<b>23,721</b>	<b>35060</b>	<b>68</b>

Note: Total processed is (refused + accepted) and does not include withdrawn applications. Refusal rate is calculated as  $[\text{refused}/(\text{refused} + \text{accepted})] \times 100$ .

Source: Table prepared by the authors with data obtained from Immigration, Refugees and Citizenship Canada from *CIMM 7.8 Applications processed from 2015 to the implementation of Chinook*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 27 April 2022, Annex A.



**Table 2—Total Number of Study Permit Applications Refused and Processed from African Countries with Significant French Populations, 2021**

Country	Refused	Processed	Refusal Rate (%)
Algeria	9,215	11,270	82
Benin, Peoples Republic of	907	1099	83
Burkina-Faso	561	889	63
Burundi	470	560	84
Cameroon, Federal Republic of	4,460	5,563	81
Central African Republic	31	36	86
Chad, Republic of	158	191	83
Comoros	21	28	75
Congo, Democratic Republic of the	3,767	4,873	77
Congo, People's Republic of the	455	554	82
Djibouti, Republic of	54	69	78
East Timor, Democratic Republic of	1	3	33
Gabon Republic	130	211	62
Guinea-Bissau	7	10	70
Guinea, Republic of	2,308	2849	81
Ivory Coast, Republic of	2,467	3,851	64
Madagascar	140	345	41
Mali, Republic of	549	817	67
Mauritania	94	125	75
Mauritius	118	542	22
Morocco	3,095	6,056	51
Niger, Republic of the	130	193	67

DIFFERENTIAL TREATMENT IN RECRUITMENT AND ACCEPTANCE RATES OF  
FOREIGN STUDENTS IN QUEBEC AND IN THE REST OF CANADA

Country	Refused	Processed	Refusal Rate (%)
Sao Tome and Principe	2	3	67
Senegal	3,191	4,362	73
Seychelles	6	8	75
Togo, Republic of	967	1108	87
Tunisia	1,375	2,499	55
<b>Total</b>	<b>34,679</b>	<b>48,114</b>	<b>72</b>
<b>Total Applicants from Africa</b>	<b>53,977</b>	<b>77,673</b>	<b>69</b>
<b>Total Applicants Not from Africa</b>	<b>168,969</b>	<b>478,077</b>	<b>35</b>

Note: Total processed is (refused + accepted) and does not include withdrawn applications. Refusal rate is calculated as  $[\text{refused}/(\text{refused} + \text{accepted})] \times 100$ .

Source: Table prepared by the authors with data obtained from Immigration, Refugees and Citizenship Canada from *CIMM 7.8 Applications processed from 2015 to the implementation of Chinook*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 27 April 2022, Annex A.

IRCC data directly available to the Committee likewise shows similar refusal rates in 2021 for African countries with significant English-speaking (68%) and French-speaking (72%) populations (Tables 1 and 2). This supports the assertion of Wei William Tao that Canada’s international student program is part of “a system that disproportionately discriminates against applicants from the [G]lobal [S]outh,” pointing to issues of discrimination toward Africans generally rather than on the basis of language.<sup>135</sup> The average refusal rate for all non-African countries is 35% (Table 2).

### *Preliminary Comparisons and Correcting for Statistical Skewness*

Statistical techniques may help sharpen the comparison between countries. Among the groups of applicants from source countries, the number of applicants from India (225,402) and China (33,076) account for by far the most applications: 47% of total number of processed applications (553,050). While an important part of an overall analysis, these proportionately large numbers of applications skew statistically the distribution of applications between countries and make direct comparisons less

135 CIMM, *Evidence*, 3 February 2022, 1110 (Wei William Tao, Canadian Immigration Lawyer and Co-Founder of the Arenous Foundation).



meaningful. To address this issue, Table 3 compares individual country refusal rates to the average refusal rate of a sample of African and non-African countries with significant English-speaking populations excluding India and China. This allows a more direct comparison between the other countries and groups of countries within the sample. For instance, the technique places the 69% African average refusal rate in more meaningful contrast with a 41% average refusal rate among countries with significant English populations, excluding India and China. These samples are sufficiently similar in size to compare directly.

**Table 3—Total Number of Study Permit Applications Refused and Processed from Selected Countries with Significant English-Speaking Populations, 2021**

Country	Refused	Processed	Refusal Rate (%)
Australia	400	1053	38
Botswana, Republic of	43	92	47
China, People's Republic of	5,565	33,076	17
Ethiopia	1,431	1630	88
Ghana	3,223	3942	82
India	91,439	225,402	41
Ireland, Republic of	62	237	26
Jamaica	1,264	2151	59
Japan	191	8,250	2
Kenya	1,653	2529	65
Korea, Republic of	335	6,197	5
Nigeria	12,770	19,528	65
Rwanda	1,470	1810	81
Singapore	235	1099	22
South Africa, Republic of	440	1207	36
Sudan, Democratic Republic of	57	74	77
United Kingdom and Overseas Territories	222	1,988	11
United States of America	1,242	9,817	13
Zimbabwe	241	485	50
<b>Total</b>	<b>122,283</b>	<b>320,567</b>	<b>38</b>
<b>Without Indian and China</b>	<b>25, 279</b>	<b>62,089</b>	<b>41</b>



Country	Refused	Processed	Refusal Rate (%)
<b>African Countries (in sample)</b>	<b>21,328</b>	<b>31,297</b>	<b>68</b>
<b>Not From Africa, Excluding India and China</b>	<b>5,604</b>	<b>33,321</b>	<b>17</b>

Note: Total processed is (refused + accepted) and does not include withdrawn applications. Refusal rate is calculated as [refused/(refused + accepted)] x 100.

Source: Table prepared by the authors with data obtained from Immigration, Refugees and Citizenship Canada from *CIMM 7.8 Applications processed from 2015 to the implementation of Chinook*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 27 April 2022, Annex A.

Taking away the skewness also allows the calculation of standard deviation. Standard deviation is a measure of statistical dispersion when the center of the data is measured about the average. Among African countries with significant English-speaking populations in the smaller sample represented in Table 3, Ethiopia (88%), Ghana (82%) and Rwanda (81%) have refusal rates that fall outside of one standard deviation of the average. Ethiopia, Ghana and Rwanda are significantly different from the average of the sample of anglophone countries listed in Table 3 to suggest that further investigation is necessary about the relative success of applicants from these African countries.

### Other Countries

Speaking to acceptance rates outside of Africa, witnesses also highlighted high refusal rates for students applying from Afghanistan,<sup>136</sup> Bangladesh<sup>137</sup> and Pakistan (for applications to Grenfell campus, Memorial University).<sup>138</sup> Dan Weber, Senior Director, Innovation and Strategy, Applyboard, also implied that, based on the acceptance rates, refusal rates for applicants from the Middle East increased significantly from 36.6% to 58.8% from the three-year period of 2016–2018 to that of 2019–2021. This compares to a world average increase of 8.6%, and an African average increase of 1.1%, during this period.<sup>139</sup>

136 Universities Canada, [Brief](#), p. 4; Memorial University of Newfoundland, [Brief](#), 7 March 2022, p. 3.

137 CIMM, [Evidence](#), 8 February 2022, 1130 (Khalilur Rahman); Memorial University of Newfoundland, [Brief](#), p. 3.

138 Memorial University of Newfoundland, [Brief](#), p. 3.

139 This additional information was submitted in a reference document that is not on the CIMM’s study webpage. Dan Weber, Senior Director, Innovation and Strategy, Applyboard, *Reference Documents*, 13 February 2022.

## Refusal Rates by Region of Recruitment

While francophone Africa has high refusal rates, preliminary IRCC data and witness testimony suggested that this problem may be shared by applicants across the African continent. At the level of countries within Africa, differences in refusal rates do not break down primarily along regional and linguistic lines. But some witnesses argued that language and region re-enter the picture when the varying sources of international student populations is considered.<sup>140</sup> As the Université Laval brief put it,

The distribution of international students by origin varies based on the institutions' language of instruction. Quebec's French-language universities mainly attract international applicants from France, sub-Saharan Africa and North Africa. These students represented 49%, 20% and 9%, respectively, of new enrolments in the fall 2020 session.<sup>141</sup>

Given that French-language institutions depend on French students from francophone Africa, and refusal rates in Africa are higher, French-language institutions face higher refusal rates.

By contrast,

English-language institutions have a very different international student makeup. More than half the international students are from Asia (51%). French and American students are the second-largest (17%) and third-largest groups ... placing English-language universities in a more favourable position than French language universities for international recruitment.<sup>142</sup>

As Asian, French and American students have higher acceptance rates, English-language universities have greater success in enrolling international students. In other cases, the causal relationship needs more investigation. As Pirita Mattola noted, "Saskatchewan has had one of the highest provincial study permit refusal rates for new study permit applicants ... since 2013. [The University of Saskatchewan is] working to understand the factors affecting student approval rates."<sup>143</sup>

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140 Université Laval, *Brief*, pp. 3-4; CIMM, *Evidence*, 10 February 2022, 1145 (Pirita Mattola).

141 Université Laval, *Brief*, p. 5.

142 Ibid.

143 CIMM, *Evidence*, 10 February 2022, 1250 (Pirita Mattola).



## Refusal Rates by Level of Education

Finally, Francis Brown Mastropaolo argued that the refusal rates are shaped by level of education that the applicant seeks: CEGEP, Bachelor's, Master's or PhD.<sup>144</sup> He argued that CEGEPs lose proportionately more international students to rejected student permits than universities. When combined with the challenges of enrolling French-speaking students from Africa, francophone CEGEPs are disadvantaged compared to universities and English-language institutions.<sup>145</sup> In 2020, for instance, the refusal rate among CEGEPs for students applying from Morocco was 55%, compared to 35% for the students applying to Bachelor's degrees, 21% for Master's degrees, and 7% for PhDs. Similarly, the rate for students applying to CEGEPs from Tunisia was 62%, compared to 29% for the students in Tunisia applying to Bachelor's degrees, 15% for Master's degrees, and 0% for PhDs. Data from 2015 to 2017 refusal rates for students applying from francophone Africa<sup>146</sup> reveals similar descending patterns for the vast majority of origin countries and years, with refusal rates the highest for students accepted at CEGEPs.<sup>147</sup> For Francis Brown Mastropaolo, Quebec is effectively penalized because it has a different education system than the rest of Canada.<sup>148</sup>

## CHAPTER 3: POTENTIAL REASONS FOR REFUSALS AND REFUSAL RATES

This chapter addresses the potential reasons behind the refusal of study permits and differences in refusal rates. The first part describes witness testimony about the reasons given by officers for refusals. These reasons stem from the interpretation of IRPA and its regulations. The second part of the chapter presents potential causes for systemic differences in these interpretations and decisions.

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144 CIMM, *Evidence*, 1 February 2022, 1150 (Francis Brown Mastropaolo); Fédération des cégeps, *Brief*, pp. 9-10.

145 CIMM, *Evidence*, 1 February 2022, 1150 (Francis Brown Mastropaolo).

146 The Fédération des cégeps data describes francophone Africa as Algeria, Benin, Burkino Faso, Republic of Cameroon, Democratic Republic of Congo, Ivory Coast, Gabon, Republic of Mali, Morocco, Senegal, Togo and Tunisia. Fédération des cégeps, *Brief*, pp. 2-7, 9-10.

147 Fédération des cégeps, *Brief*, pp. 9-10.

148 CIMM, *Evidence*, 1 February 2022, 1245 (Francis Brown Mastropaolo).

## Refusals Based on Immigration Law and Regulations

Witnesses highlighted many reasons for refusal that were put forward by visa officers. Most refusals are linked to the visa officer's belief that the student would not leave Canada and they possess insufficient proof of financial resources, as explained below. The department provided statistics on the reasons for refusal given during the 2019–2021 period, which are reproduced in Annex A of this report.

### The Obligation to Leave Canada by the End of the Authorized Period of Stay

Witnesses informed the Committee that the most common reason for refusal received by potential international students was that the officer was not satisfied that they would return to their country of origin.<sup>149</sup> IRPA and its regulations are peppered with this obligation to satisfy a visa officer that an international student will leave by the end of an authorized stay.<sup>150</sup> In IRPA, it first appears in relation to temporary residents in general at section 20(1)(b) which frames the obligation upon entry into Canada:

20 (1) Every foreign national ... who seeks to enter or remain in Canada must establish, ...

(b) to become a temporary resident, that they hold the visa or other document required under the regulations and will leave Canada by the end of the period authorized for their stay.

IRCC requires students to prove that they will leave Canada through a series of documents. Visa officers examine the validity of a study plan or statement of purpose, a student's family ties to Canada and family ties to the country of origin. They also look at the student's career and travel history.<sup>151</sup> Wei William Tao told the Committee he thought that there is a mis-assessment of those factors.<sup>152</sup> He described the outcome of the officers' examinations: "[t]he smallest gap or perceived credibility challenge is

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149 CIMM, *Evidence*, 1 February 2022, 1240 (Larissa Bezo); 1220 (Francis Brown Mastropaolo); CIMM, *Evidence*, 3 February 2022, 1250 (Thibault Camara, President, Le Québec c'est nous aussi), 1200 (Alain Dupuis), 1210 (Martin Normand); CIMM, *Evidence*, 10 February 2022, 1110 (Paulin Mulatris); Université Laval, *Brief*, p. 6.

150 *Immigration and Refugee Protection Act* (S.C. 2001, c. 27), ss. 20(1)(b), 22(2), 29(2); *Immigration and Refugee Protection Regulations* (SOR/2002-227), ss. 179(b) and 216(1)(b).

151 Virtue Educational and Allied Services, *Brief*, pp. 1-2; Le Québec c'est nous aussi, *Brief*, p.9; Wei William Tao, *Brief*, pp. 5-6, Université Laval, *Brief*, p. 9.

152 CIMM, *Evidence*, 3 February 2022, 1155 (Wei William Tao).



framed as an issue of insufficient evidence.”<sup>153</sup> Virtue Educational and Allied Services pointed out that “[s]tudy permits have been denied due to the children having insufficient travel history. How many kids of age 15-20 years old from other countries will have travelled out of their shores at such a young age? What counts as sufficient travel history? This remains unclear.”<sup>154</sup> Agnes Aigbinode, founder of Virtue Educational and Allied Services, further noted that “[i]t is absurd that the fact of a student having or not having a relative in Canada should be a critical determinant for SP [study permit] issuance.”<sup>155</sup> Finally, she wrote that

[i]t is unfathomable that children aged 15 and 16 years old, in high school and with valid offers from accredited Canadian schools, whose tuition have been fully paid for the entire year, would be refused study permit on the grounds of the so-called “purpose of visit.” What other reasons would outweigh a Letter of Acceptance from an accredited school especially where the sponsors are the parents, and tuition for a year has been paid in full?<sup>156</sup>

Another witness noted that individuals from “some countries might have the benefit of having their documents more easily recognized by a third party” that guarantees them for IRCC.<sup>157</sup> For instance, universities may guarantee education qualifications more easily from some countries than for others.<sup>158</sup>

Denise Amyot spoke about refusals based on “what officers might describe as a questionable education pathway” for students with university education applying at colleges and other learning institutes.<sup>159</sup> Martin Normand, Director, Strategic Research and International Relations, Association des collèges et universités de la francophonie canadienne, relayed to the Committee that “applications have been refused because the officer assessing the file didn’t consider that wanting to study in French outside Quebec was a legitimate course of action.”<sup>160</sup> Luc Bussières, Rector, Hearst University, told the

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153 Wei William Tao, *Brief*, p. 6.

154 Virtue Educational and Allied Services, *Brief*, pp. 1-2

155 Ibid.

156 Ibid.

157 Peter Hurley, As an Individual, *Brief*, p. 9.

158 Ibid., pp. 7-9.

159 CIMM, *Evidence*, 8 February 2022, 1230 (Denise Amyot).

160 CIMM, *Evidence*, 3 February 2022, 1210 (Martin Normand).

Committee they suggest to students to indicate in their cover letters that “they want to study in French, but they also want to develop their skills in English.”<sup>161</sup>

The Minister told the Committee “[t]here is a good reason why we have a need to return when you’re applying to come to Canada on a temporary basis.”<sup>162</sup> He later explained “we need to improve the pathway to permanent residency for those who want to stay, but it’s not possible for us to have every single student qualify for permanent residence.”<sup>163</sup> He further informed the Committee about a possible concern regarding students claiming asylum:

[W]e need to prevent a lot of students coming with the purpose of staying permanently by claiming asylum, for example, when we have different streams for people who are coming for purposes other than studying.<sup>164</sup>

As such, the Committee recommends:

## **Review and Ease the International Student Selection Criteria and Processes**

### **Recommendation 13**

**That Immigration, Refugees and Citizenship Canada review international student selection criteria and processes, make the study permit application process more transparent, reduce application processing times, and allow more flexibility for the evidence used to establish that an applicant meets the financial criteria.**

### **Provide Consistent Processing Times**

### **Recommendation 14**

**That Immigration, Refugees and Citizenship Canada work to provide for consistent processing times for the same application categories across different visa offices.**

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161 CIMM, *Evidence*, 10 February 2022, 1255 (Luc Bussières).

162 CIMM, *Evidence*, 17 February 2022, 1125 (Hon. Sean Fraser).

163 Ibid.

164 Ibid., 1150.



## Dual Intent

Section 22(2) of IRPA sets out the concept of dual intent where a temporary resident, like a student, may also wish to become permanently established in Canada:

22(2) An intention by a foreign national to become a permanent resident does not preclude them from becoming a temporary resident if the officer is satisfied that they will leave Canada by the end of the period authorized for their stay.

As witnesses told the Committee, this section of IRPA has the visa officer weighing the international student's intention to become a permanent resident against the obligation to leave at the end of their studies.<sup>165</sup>

Gideon Christian informed the Committee that visa officers were misinterpreting this section of IRPA:

"Dual intent" means that if somebody is coming to Canada to study and they also have the intent to become a permanent resident after that, it is perfect and fine under the *Immigration and Refugee Protection Act*, but I warn study permit applicants from Africa: "Do not ever bring up the issue of dual intent in your application—if you do, it's going to come back to haunt you." With regard to dual intent, the problem we are having is that dual intent is being misinterpreted by IRCC decision-makers, and that is what is sad about it, because the law allows for it, but if you express that intent, you are likely going to be refused a study visa to Canada.<sup>166</sup>

Many witnesses noted that there is a contradiction in the government's efforts to promote study as a desirable pathway towards permanent residency and the refusal of applicants who openly mention their desire to stay.<sup>167</sup> Paulin Mulatris told the Committee that the criteria used to assess applicants goes beyond academics to also treat immigration matters:

It's true that recruitment looks at plans after graduation and employment, but that should be made clear when they interview the students. In the questionnaire, students are asked if they intend to stay in Canada after their studies. ... If a student has the

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165 CIMM, [Evidence](#), 1 February 2022, 1220 (Francis Brown Mastropaolo); CIMM, [Evidence](#), 10 February 2022, 1235 (Yan Cimon).

166 CIMM, [Evidence](#), 8 February 2022, 1210 (Gideon Christian).

167 CIMM, [Evidence](#), 8 February 2022, 1230 (Denise Amyot), 1215 (Martin Basiri); CIMM, [Evidence](#), 1 February 2022, 1230 (Francis Brown Mastropaolo); CIMM, [Evidence](#), 3 February 2022, 1135 (Lou Janssen Dangzalan, Immigration Lawyer); CIMM, [Evidence](#), 10 February 2022, 1145 (Paulin Mulatris), 1220 (Luc Bussi eres); CIMM, [Evidence](#), 1 March 2022, 1115 (Shamira Madhany); Saint Mary's University, [Brief](#), p. 2.

misfortune to check that box, their chances of getting a visa are nil ... : the authorities believe that they really do not intend to study in Canada, and they want to stay in Canada. In my opinion, they are asking ambiguous questions to applicants who want to come study in Canada.<sup>168</sup>

François Dornier further told the Committee that these refusals based on dual intent will likely lead to a disinterest by institutions to put further effort in recruiting in Africa.<sup>169</sup> Wei William Tao noted that

[t]he concept of dual intention under section 22(2) of the *Immigration and Refugee Protection Act*, wherein an applicant can demonstrate that they are able to return to their country of residence or citizenship following their studies even if they hold a future permanent residence intention, seems not to apply to the Global South.<sup>170</sup>

Yan Cimon said that this criterion “hurts Canada, its image and our recruitment efforts. It’s costly in terms of resources for our government authorities.”<sup>171</sup> Several witnesses spoke about the importance of international students to their community, research institutions and knowledge industries.<sup>172</sup> Alain-Sébastien Malette informed the Committee that:

These students are absolutely vital to us. These are highly qualified, super bright students, and they’re essential to our communities and to our sustainability. I do think subjective criteria such as dual intent need to be rethought profoundly and looked at in the optics of our immigration policy for highly qualified people. ... We have super bright students in our office who are just finishing their engineering degree, and they get a job within a couple of months. I think this is an absolutely vital and essential element that we need to profoundly review.<sup>173</sup>

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168 CIMM, [Evidence](#), 10 February 2022, 1130 (Paulin Mulatris).

169 CIMM, [Evidence](#), 1 March 2022, 1130 (François Dornier).

170 Wei William Tao, [Brief](#), p. 5.

171 CIMM, [Evidence](#), 10 February 2022, 1245 (Yan Cimon).

172 CIMM, [Evidence](#), 10 February 2022, 1245 (Luc Bussi eres); CIMM, [Evidence](#), 1 February 2022, 1225 (Larissa Bezo).

173 CIMM, [Evidence](#), 10 February 2022, 1245 (Alain-S ebastien Malette).



Witnesses had strong opinions about the use of section 22(2) of IRPA. Some stated it needed a rethink.<sup>174</sup> Many said it should be eliminated.<sup>175</sup> Larissa Bezo indicated that IRCC should create a program that formally acknowledges and encourages international students in pursuing complementary immigration goals.<sup>176</sup> Shamira Madhany told the Committee that the Nova Scotia Study and Stay Program, in which students commit to living in the province for two years, is quite successful.<sup>177</sup>

When asked if a students' intention to remain in Canada harmed their application, the Minister replied:

There's a unique issue here. ... I think there's a good reason for why the rule exists, but I think we need to pursue certain changes, specifically flexibility in the express entry system and partnership with certain provinces so that we can establish a pathway to permanent residency for those we want to stay.<sup>178</sup>

The Minister informed the Committee that IRCC has to work with the "provinces to identify students whom they may wish to have stay."<sup>179</sup>

The Committee recommends:

## Review and Clarify Dual Intent Provision

### Recommendation 15

**That Immigration, Refugees and Citizenship Canada review and clarify the dual intent provision, sections 20(1)(b) and 22(2) of the *Immigration and Refugee Protection Act*, so that the intention of settling in Canada does not jeopardize an individual's chances of getting a study permit.**

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174 CIMM, [Evidence](#), 3 February 2022, 1135 (Wei William Tao); CIMM, [Evidence](#), 10 February 2022, 1245 (Alain-Sébastien Malette).

175 CIMM, [Evidence](#), 3 February 2022, 1300 (Alain Dupuis); CIMM, [Evidence](#), 8 February 2022, 1255 (Denise Amyot); CIMM, [Evidence](#), 10 February 2022, 1145 (Paulin Mulatris), 1145 (Pirita Mattola), 1155 (Carole St. Laurent), 1245 (Luc Bussi eres), 1245 (Yan Cimon).

176 CIMM, [Evidence](#), 1 February 2022, 1145-1150 (Larissa Bezo).

177 CIMM, [Evidence](#), 1 March 2022, 1115, 1205 (Shamira Madhany); Atlantic Canada Opportunities Agency, [Study and Stay Program](#), Backgrounder.

178 CIMM, [Evidence](#), 17 February 2022, 1125 (Hon. Sean Fraser).

179 Ibid., 1150.

## **Evaluate Students on Their Potential and Value to Canadian Institutions and Communities**

### **Recommendation 16**

**That Immigration, Refugees and Citizenship Canada evaluate students on their potential and value to Canadian institutions and communities, not on their ties to their home countries.**

### **Sufficient Funds Without Needing to Work**

Another condition to study in Canada that is the source of refusals is the need for international students to have the necessary funds without needing to work in Canada. This obligation appears in the IRPR, at section 220:

220 An officer shall not issue a study permit to a foreign national ... unless they have sufficient and available financial resources, without working in Canada, to

(a) pay the tuition fees for the course or program of studies that they intend to pursue;

(b) maintain themselves and any family members who are accompanying them during their proposed period of study; and

(c) pay the costs of transporting themselves and the family members referred to in paragraph (b) to and from Canada.

Witnesses told the Committee that this ground for refusal was not as straightforward as it seemed when it came to adding up all the resources at the students' disposal. Yan Cimon highlighted how students have the right to work a certain number of hours per week, and sometimes have research assistant contracts. He also told the Committee that scholarships should be considered proof of financial resources.<sup>180</sup>

Denise Amyot explained that financial and cultural differences in regard to banking systems and sources of financial sufficiency need to be taken into account when looking at how prospective international students can sustain themselves when in Canada.<sup>181</sup>

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180 CIMM, *Evidence*, 10 February 2022, 1235, 1255 (Yan Cimon).

181 CIMM, *Evidence*, 8 February 2022, 1230 (Denise Amyot).



For Jared Maltais, there is a communication issue around what exactly is accepted as proof that international students are financially ready to come to Canada.<sup>182</sup>

The Minister told the Committee that IRCC works “with the provinces to identify what proof of funds they will need in order to get by within their community. ... We don’t want to create a system that promotes people to come to Canada only to see them fail when they get here.”<sup>183</sup> He explained that the relationship with financial institutions may vary by country. Pemi Gill of IRCC told the Committee that it is working to improve outcomes for students:

The department is very much committed to facilitating the mobility of bona fide students. The most common reason for refusal is that the applicant was not able to show the officer that they were able to support themselves while in Canada and thus demonstrate that they would be leaving Canada at the end of their stay. Oftentimes, this is seen inasmuch as the applicant is not able to show that their studies are affordable for themselves and their family. We note that in Africa in particular that is often a core reason for refusal, and is a space that the department is working to improve. ... Programs like the student direct stream and the Nigeria express stream are ways for clients to demonstrate that they have the funds and therefore demonstrate that they would be able to support their studies in Canada.<sup>184</sup>

The Committee heard that designated learning institutions are often at a loss to understand the reasons for refusal given to the international students that have been accepted into one of their programs, and that the institutions are no longer certain what is required.<sup>185</sup> Yan Cimon characterized the refusals as “often poorly documented.”<sup>186</sup> Designated learning institutions have told the Committee that ad hoc communications with visa offices clear up misunderstandings, but a more sustained dialogue would be helpful.<sup>187</sup>

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182 CIMM, [Evidence](#), 3 February 2022, 1140 (Jared Maltais).

183 CIMM, [Evidence](#), 17 February 2022, 1145 (Hon. Sean Fraser).

184 CIMM, [Evidence](#), 17 February 2022, 1210 (Pemi Gill, Director General, International Network, Department of Citizenship and Immigration).

185 CIMM, [Evidence](#), 8 February 2022, 1230 (Denise Amyot); CIMM, [Evidence](#), 10 February 2022, 1255 (Luc Bussières); CIMM, [Evidence](#), 3 February 2022, 1250 (Thibault Camara).

186 CIMM, [Evidence](#), 10 February 2022, 1235 (Yan Cimon).

187 CIMM, [Evidence](#), 8 February 2022, 1300 (Denise Amyot); CIMM, [Evidence](#), 1 March 2022, 1120 (François Dornier).

As such, the Committee recommends:

### **Provide More Transparency in Refusals**

#### **Recommendation 17**

**That Immigration, Refugees and Citizenship Canada publish the guidelines given to its officers, provide the acceptance criteria for study permits and visas, and further offer more fulsome justifications to applicants for the refusal of their applications.**

### **Create Direct Lines of Communications**

#### **Recommendation 18**

**That Immigration, Refugees and Citizenship Canada create direct lines of communication between visa offices and designated learning institutions so that they may share information on an on-going basis about student applications, provided that the institution is authorized by the student to do so.**

## **Potential Causes for Systemic Differences in Decisions**

Overall, many witnesses suggested that reasons given by officers do not reflect the reality of applicants applying for study permits. Students may look like they do not have the financial resources to live and study in Canada because they possess financial means through their parents and families. They may look like they have no reason to return because they are young, single and possess little job and travel experience. They may seem like they will not return because they have listened to university recruiters, and expressed interest in settling in Canada through legal means. And they may seem to have an unreasonable study plan if officers do not understand education and employment realities on the ground, and do not put stock on the DLI's offer of admission as something indicating probable academic success.<sup>188</sup>

Arguably, interpretations of the law and regulations may legitimately lead to opposing judgements. But many witnesses argued that the reasons behind the decisions often seem arbitrary. As the Le Québec c'est nous aussi brief put it, with respect to reasons why an officer does not believe an applicant will return to their country, "those reasons

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188 CIMM, *Evidence*, 8 February 2022, 1230, 1300 (Denise Amyot); CIMM, *Evidence*, 3 February 2022, 1150 (Wei William Tao); CIMM, *Evidence*, 1 February 2022, 1230 (Francis Brown Mastropaolo); Le Québec c'est nous aussi, *Brief*, p. 9; Earl Blaney, *Brief*, second written submission, pp. 11-12.



are given regardless of the evidence that the claimants provide.”<sup>189</sup> Other witnesses recounted many students receiving contradictory reasons, or different reasons when they applied and were refused a second time.<sup>190</sup> Still others pointed to the high success rate of students who challenge their refusals in Federal Court as an indicator that decision makers at IRCC are issuing refusals on an arbitrary or even discriminatory basis.<sup>191</sup>

Moving behind individual reasons given, witness testimony indicated larger possible causes for officer interpretations and decisions, and for the resulting patterns in refusal rates.

### Reported Racism at Immigration, Refugees, and Citizenship Canada

Most simply and directly, IRCC visa officer decisions may be affected by racial bias.<sup>192</sup>

In the wake of the international protests of the murder of George Floyd, a Black American, by a police officer, IRCC conducted an employee survey on perceptions of racism in the department. The survey responses differed “significantly based on respondent racial and ethnic background.” Among racialized respondents “significant proportions ... considered racism to be a problem in the department.”<sup>193</sup>

As a result, IRCC hired Pollara Strategic Insights to conduct 10 two-hour online focus groups with 54 employees. These employees volunteered to participate and worked at different levels at IRCC. The vast majority also self-identified as members of racialized communities.<sup>194</sup> Summarizing the results in a report, Pollara Strategic Insights wrote that the groups reported experiences of racism at IRCC, including “microaggressions.” For instance, some respondents mentioned “widespread internal references to certain African countries as ‘the dirty 30,’” and stereotypes of Nigerians “as particularly untrustworthy.”<sup>195</sup> Respondents noted racial biases in hiring, and a lack of racialized

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189 Le Québec c’est nous aussi, *Brief*, p. 9.

190 CIMM, *Evidence*, 10 February 2022, 1255 (Luc Bussi eres)

191 CIMM, *Evidence*, 3 February 2022, 1110 (Wei William Tao); 1215 (Thibault Camara).

192 CIMM, *Evidence*, 8 February 2022, 1150 (Gideon Christian); CIMM, *Evidence*, 3 February 2022, 1110 (Jared Maltais); Wei William Tao, *Brief*, pp. 2-3.

193 Pollara Strategic Insights, *IRCC Anti-Racism Employee Focus Groups*, Final Report, prepared for Immigration, Refugee and Citizenship Canada, 23 June 2021, p. 5.

194 Ibid.

195 Ibid., p. 11.

employees in management roles. They also highlighted a lack of culture of and processes for addressing racism within the organization.<sup>196</sup>

Most significantly for considering discrimination and differential outcomes, participants expressed concern that:

some of the overt and subtle racism they have witnessed by both employees and decision makers can and probably must impact case processing. Some point[ed] to differences in refusal rates by country as an indicator that some sort of bias must be at play.<sup>197</sup>

Pollara Strategic Insights qualifies that the results of its report are indicative of racism and its effects, rather than definitive, because the data is qualitative. No statistical analysis is possible. The sample of respondents is also small and non-random. This means that “the sample ... cannot be said to be representative of all IRCC employees.”<sup>198</sup> Two witnesses to the Committee, however, saw the report as evidence of the existence of systemic racism at IRCC—a systemic racism that affects officer decisions and refusals.<sup>199</sup>

In its public response to the Pollara report, IRCC recognized “the presence of racism ... within [the] organization.”<sup>200</sup> IRCC further acknowledged that due to the nature of its mandate to promote a strong and diverse Canada, it must hold itself to the highest possible standards so that programs, policies and client service are free from any racial bias. In the last two years, IRCC has implemented several measures, which include:

- Creat[ing] a task force in July 2020 dedicated full-time to eliminate racism in all of its forms at IRCC by providing the department with strategic direction on people management, policy, and service delivery of programs[;]
- [Requiring] employees, middle managers and executives ... to take mandatory unconscious bias training which is tracked[;]

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196     ibid., p. 12.

197     ibid., p. 13.

198     ibid., p. 6.

199     Wei William Tao, *Brief*, p. 7; CIMM, *Evidence*, 8 February 2022, 1150 (Gideon Christian).

200     IRCC, “[Our commitment to anti-racism](#),” 28 May 2021.



- [Including] anti-racism objectives ... in performance management agreements for all executives[;]
- Launch[ing] a Black Employee Network to ensure Black voices are heard in driving change and are included at the decision making table[; and]
- Evaluat[ing] ... potential bias entry points in policy and program delivery, and new approaches to how risk is balanced in an operational context through various projects.<sup>201</sup>

As well, IRCC has taken the following steps to address potential bias in the processing and review of immigration, refugee and citizenship applications:

- The Operations Sector has set up a Service Delivery Anti-Racism Working Group and mandatory trainings to support decision makers understanding of procedural fairness and impartiality.
- [IRCC] now [has] nearly two dozen projects under development to reduce and eliminate racial barriers – with a large focus on ... African clients due to the fact that this region historically faces longer processing times and lower approval rates.
- In 2021, the overseas Quality Assurance program has been expanded to improve systematic exercises, including annual refusal reviews. Protocols are currently being piloted for Student processing in Colombia, Brazil, Panama and Costa Rica before expanding.
- Continued expansion of digitization will allow for more remote work sharing of caseloads, ensuring processing times in Africa come into line with Global processing times.<sup>202</sup>

Since June 2021, “IRCC is also mapping client race-related data to determine operations baseline and future data needs necessary to identify possible bias, systemic racism and barriers in programs and procedures.”<sup>203</sup>

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201 Sessional 8555-441-132, [Q-132](#), asked by Jasraj Singh Hallan (Calgary Forest Lawn), 30 November 2021.

202 Ibid.

203 IRCC, *CIMM 7.12 Prejudices in Decision Making*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 13 April 2022, p. 1.

The Committee recommends:

### **Conduct and Publish Regular Reports on the Results of Ant-Racist and Anti-Oppression Trainings**

#### **Recommendation 19**

**That Immigration, Refugees and Citizenship Canada conduct and publish regular reports similar to the Pollara Strategic Insights Report, and that Immigration, Refugees and Citizenship Canada provide regular metrics on the results of the anti-racist and anti-oppression trainings undertaken by the department.**

### **Different Program Rules and Requirements**

Different IRCC program rules and document requirements also may create discrimination over time. IRCC sometimes requires different documents for similar programs in different parts of the world—a difference in requirements that critics argue is not justified. For example, Gideon Christian pointed to the differences in financial requirements highlighted above between the Student Direct Stream and the Nigeria Student Express as “discriminatory policy,” because the financial threshold is unjustifiably higher, and even those who reached the higher threshold were often refused study permits.<sup>204</sup>

More broadly, Wei William Tao highlighted that the increased document requirements for students from visa-requiring countries creates the premise for the stricter scrutiny that leads to greater refusals and delays. Where “[s]tudents from visa-exempt countries do not need to even submit a study plan/statement of purpose nor explain themselves ... visa-requiring applicants from the Global South, the parents of those who apply (what they do for work) what city the family is from, and who holds the funds are all vetted with a fine-tooth comb.”<sup>205</sup> Furthermore, he noted that “[g]iven Canada’s history of racialization of Black migrants ... it is incumbent on Canadian immigration to explore how to create a more racially just, anti-Racist framework for assessing TRVs and study permits from African countries.”<sup>206</sup> As he put it elsewhere, “immigration officers ... place significant barriers on Applicants from Africa (and the larger Global south) such as increased documentation requirements and stricter scrutiny for issues such as

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204 CIMM, *Evidence*, 8 February 2022, 1120 (Gideon Christian).

205 Wei William Tao, *Brief*, p. 6.

206 *Ibid.*, p. 2



misrepresentations.”<sup>207</sup> Paulin Mulatris pointed out that “[i]f immigration legislation has evolved, we have to wonder if the criteria for granting study permits contain traces of social, economic or racial exclusion factors, which were prevailing principles prior to 1967 in immigration legislation. So it's very important that we reflect on this issue.”<sup>208</sup>

As such, the Committee recommends:

### **Collect Race-Based Data**

#### **Recommendation 20**

**That Immigration, Refugees and Citizenship Canada collect race-based data and that offices with high refusal rates be automatically audited by a third party.**

#### **Conduct a Study of the Anti-Black and Anti-Francophone African Racism in Canada's Immigration History**

#### **Recommendation 21**

**That Immigration, Refugees and Citizenship Canada conduct a detailed bilingual study of the social history of anti-Black and anti-Francophone African racism in Canadian immigration to ensure mistakes are not repeated.**

### **Data Technology in the Application Process**

More broadly, IRCC data sorting technology and software may influence decision-making, because they present some types of applications in better or worse light. Indeed, in the Pollara Strategic Insights report, some of the focus group members were concerned that “increased automation of processing will embed racially discriminatory practices in a way that would be harder to see over time.”<sup>209</sup> During the Committee's study, many witnesses expressed apprehension about two IRCC data

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207 Ibid., p. 6.

208 CIMM, *Evidence*, 10 February 2022, 1110 (Paulin Mulatris).

209 Pollara Strategic Insights, *IRCC Anti-Racism Employee Focus Groups*, Final Report, prepared for Immigration, Refugee and Citizenship Canada, 23 June 2021, p. 13.

tools: the Advanced Analytics program<sup>210</sup> and the Chinook software.<sup>211</sup> Others, however, argued for the positive potential of the former<sup>212</sup> and latter<sup>213</sup> technologies to remove bias or increase efficiency. IRCC has committed to assess “program and service delivery elements” of its larger Digital Modernization Project “to identify potential entry points for bias and racism.”<sup>214</sup>

### Advanced Analytics and Temporary Resident Visas

On 31 January 2022, the Minister announced measures to improve the experience of clients that use IRCC services. These measures aim to modernize Canada’s immigration system and “achieve the more predictable processing times that our clients expect and deserve.”<sup>215</sup> Specifically for temporary resident visa (TRV) applications, which include international students, IRCC is expanding its use of advanced data analytics to sort and process all TRV applications submitted from outside Canada. IRCC has used advanced data analytics since 2018 to:

help sort and process more than 1 million TRV applications from countries where there is a high volume of applications [mostly China and India]. During this time, it has been shown that routine files can be assessed **87% faster** using the system. This results in some applicants receiving decisions more quickly. In addition, the technology assumes a significant portion of clerical and repetitive tasks related to sorting applications,

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210 CIMM, [Evidence](#), 1 February 2022, 1150 (Larissa Bezo); Wei William Tao, [Brief](#), pp. 9-10.

211 CIMM, [Evidence](#), 1 February 2022, 1150 (Francis Brown Mastropaolo); CIMM, [Evidence](#), 3 February 2022, 1215, 1240, 1250 (Thibault Camara); 1105, 1125, 1140, 1150 (Lou Janssen Dangzalan); 1110, 1130, 1135, 1150 (Wei William Tao); Le Québec c’est nous aussi, [Brief](#), p. 11; Fédération des communautés francophones et acadienne du Canada, [Brief](#), p. 1; CIMM, [Evidence](#), 10 February 2022, 1220 (Luc Bussières).

212 CIMM, [Evidence](#), 8 February 2022, 1215 (Martin Basiri); 1245 (Leah Nord, Senior Director, Workforce Strategies and Inclusive Growth, Canadian Chamber of Commerce); CIMM, [Evidence](#), 10 February 2022, 1300 (Alain-Sébastien Malette).

213 CIMM, [Evidence](#), 8 February 2022, 1250 (Martin Basiri); CIMM, [Evidence](#), 10 February 2022, 1300 (Yan Cimon).

214 IRCC, *CIMM 7.12 Prejudices in Decision Making*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 13 April 2022, p. 1.

215 IRCC, [Modernizing Canada’s immigration system to support economic recovery and improve client experience](#), News release, 31 January 2022.



which allows IRCC officers to focus their attention on assessing applications and making final decisions [emphasis in the original].<sup>216</sup>

In his testimony about advanced data analytics, Lou Janssen Dangzalan, immigration lawyer, mentions the quality assurance process for the system that he discovered through ATIP disclosures, which include 2018-2021 IRCC literature on principles of the program’s development, and those of “digital transformation” technologies, more broadly.<sup>217</sup> IRCC defines advanced data analytics as technology that captures and analyzes immense volumes of data, and uses these discoveries to make predictions. In the TRV application program, the computer uses advanced statistics to detect and apply patterns from past visa processing to make predictions about eligibility and admissibility complexity. It then sorts applications on this basis to aid human decision-making. The program is a form of Artificial Intelligence (AI) in the broad sense of training a computer to perform a sorting task that typically requires human intelligence. The program also uses more advanced AI insofar as it deploys machine learning. The machine not only follows a given algorithm to make predictions, but continually learns from its success to improve its algorithm.<sup>218</sup>

According to one expert, Lucia Nalbandian from Ryerson University, the system tests admissibility and eligibility in three stages:

- The model uses rules established by experienced visa officers and advanced analytics to determine if the application is complex. If the machine makes this prediction, it must be viewed by a visa officer to check admissibility and eligibility requirements.
- If the application is not sufficiently complex, the system triages the application into three tiers, also based on complexity. This process follows the logic of machine learning.

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216 IRCC, *Advanced data analytics to help IRCC officers sort and process temporary resident visa applications*, News release, 24 January 2022.

217 CIMM, *Evidence*, 3 February 2022, 1125, 1150 (Lou Janssen Dangzalan); ATIP 2A-2020-73215; *Digital Transformation at IRCC: Benefits, Risks and Guidelines for the Responsible Use of Emergent Technologies*, White Paper, v 1.1, Strategic Policy and Planning, March 2018, p. 8-10, ATIP; *Policy Playbook on Automated Support for Decision-Making*, Strategic Policy Branch, Immigration, Refugees and Citizenship Canada, February 2021, A-2021-28399 (005).

218 Lucia Nalbandian, *Using Machine-Learning to Triage Canada’s Temporary Resident Visa Applications*, Ryerson Centre for Immigration and Settlement and the Canada Excellence Research Chair in Migration & Integration, Working Paper No. 2021/9, July 2021, p. 8.

- The most complex two tiers are reviewed by officers, while the most straightforward applications are automatically given positive eligibility determinations.<sup>219</sup>

Officers then decide the fate of these straightforward cases based on a subsequent admissibility screening. They may also revisit the eligibility criteria of these cases if they detect a possible problem.<sup>220</sup>

In its January 2022 news release, IRCC highlights that:

IRCC officers will continue to make the final decision on all applications, and **only an IRCC officer can refuse an application**. The system **never refuses or recommends refusing applications** [emphasis in the original].<sup>221</sup>

The program automates only positive eligibility determinations. Officers ultimately judge these applications based on admissibility and overall review. They also refuse or accept applications sorted as complex based on both eligibility and admissibility.<sup>222</sup>

As part of compliance with the Treasury Board's Directive on Automated Decision-Making,<sup>223</sup> the department completed an algorithmic impact assessment<sup>224</sup> to assess the analytical models used for temporary resident visa applications.<sup>225</sup> The development of the program was informed by guiding principles, including those on responsible design, transparency, and avoiding bias in datasets. In developing automation and digital transformative technologies, such as AI and advanced data analytics, for instance, developers must identify legal implications and risks early on, and

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219 Lucia Nalbandian, *Using Machine-Learning to Triage Canada's Temporary Resident Visa Applications*, Ryerson Centre for Immigration and Settlement and the Canada Excellence Research Chair in Migration & Integration, Working Paper No. 2021/9, July 2021.

220 IRCC, *Algorithmic Impact Assessment – Advanced Analytics Triage of Overseas Temporary Resident Visa Applications*.

221 IRCC, *Advanced data analytics to help IRCC officers sort and process temporary resident visa applications*, News release, 24 January 2022.

222 IRCC, *Algorithmic Impact Assessment – Advanced Analytics Triage of Overseas Temporary Resident Visa Applications*.

223 Government of Canada, *Directive on Automated Decision-Making*.

224 Government of Canada, *Algorithmic Impact Assessment—Advanced Analytics Triage of Overseas Temporary Resident Visa Applications*.

225 Government of Canada, *Advanced data analytics to help IRCC officers sort and process temporary resident visa applications*.



consult external and internal stakeholders.<sup>226</sup> The system must also undergo quality assurance, which includes:

- officers reviewing a random sample of Tier One applications (10%) each day to determine the eligibility and admissibility of the applicant;
- officials monitoring this sample to ensure 99% concurrence between officers and the model’s assessment to approve eligibility (i.e. officers approve at least 99% of these applications);
- officials monitoring daily the volume of applications being triaged to each tier to ensure the triage is functioning as expected;
- officials periodically monitoring of the trends in these indicators to assess whether there is need to retrain the model;
- officials monitoring outcomes of these systems.<sup>227</sup>

Throughout the Committee’s study, witnesses were concerned that the advanced analytics program may imbed racial and other biases within its sorting, because the program algorithms make predictions based on historical data and present-day officer rules—data and rules that may be themselves biased.<sup>228</sup> Several witnesses argued that oversight from independent experts was an essential component to the use of any artificial intelligence system in order to eliminate racism or discrimination.<sup>229</sup>

## Chinook

Witnesses were also concerned about Chinook, a software program that some IRCC offices use to present multiple applications, and related documents, on a single

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226 *Policy Playbook on Automated Support for Decision-Making*, Strategic Policy Branch, Immigration, Refugees and Citizenship Canada, February 2021, A-2021-28399 (005).

227 *Overview of the Analytics-Based Triage of Temporary Resident Visa Applications*, Immigration, Refugees and Citizenship Canada, p.3, ATIP 2A-2020-37581-000045.

228 Wei William Tao, *Brief*, 3 February 2022; CIMM, *Evidence*, 8 February 2022, 1200 (Gideon Christian).

229 CIMM, *Evidence*, 8 February 2022, 1205 (Gideon Christian); Bellissimo Law Group, *Brief*, p. 2.

screen.<sup>230</sup> Wei William Tao also testified that he had peripheral involvement in a Federal Court case, *Abigail Ocran v. The Minister of Citizenship and Immigration*, in which the plaintiff's lawyer argued that the significant jump in student permit refusal rates in 2019 and 2020 can be attributed to widespread use of the Chinook tool by 2019.<sup>231</sup>

IRCC introduced Chinook in select visa offices to increase the efficiency and consistency of temporary resident application decisions—including decisions about applications by international students. First launched in a few visa offices in 2018, Chinook runs alongside and supplements IRCC's Global Case Management System (GCMS). When using all its functions, the program performs a series of tasks:

- 1) extracting relevant application information from a batch of applications in GCMS;
- 2) creating a spreadsheet of the applications and the relevant information selected by the user (e.g., age, reason for coming, etc.);
- 3) presenting risk indicators and word flags for applications, based on saved data about past application decisions;
- 4) allowing decision makers to input decisions into a pop-up menu;
- 5) generating a list of possible reasons for refusal, out of which the decision maker may select one or several reasons;
- 6) recording decisions in GCMS; and
- 7) allowing users to submit requests to the program administrator to add, renew or modify risk indicators and word flags for subsequent decisions.<sup>232</sup>

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230 CIMM, *Evidence*, 1 February 2022, 1150 (Francis Brown Mastropaolo); CIMM, *Evidence*, 3 February 2022, 1215, 1240, 1250 (Thibault Camara); 1105, 1125, 1140, 1150 (Lou Janssen Dangzalan); 1110, 1130, 1135, 1150 (Wei William Tao); Le Québec c'est nous aussi, *Brief*, p. 11; Fédération des communautés francophones et acadienne du Canada, *Brief*, p. 1; CIMM, *Evidence*, 10 February 2022, 1220 (Luc Bussièrès); EduNova, *Brief*, p. 2.

231 CIMM, *Evidence*, 3 February 2022, 1130 (Wei William Tao); Cross-Examination of Andie Melo Daponte, 4 August 2021, *Abigail Ocran v. The Minister of Citizenship and Immigration*, Federal Court, IMM-6571-20, 17 December 2020, pp. 69-73.

232 These functions are realized through five modules, the first three of which can be used independently of the others. The modules are designated Module 1 (File Management), Module 2 (Pre-assessment), Module 3 (Decision-Maker), Module 4 (Post-Decision) and Module 5 (Indicator Management). Affidavit, *Abigail Ocran v. The Minister of Citizenship and Immigration*, Federal Court, IMM-6571-20, 17 December 2020, pp. 3-6.



Like the advanced analytics program, Chinook does not make any refusal decisions. But Chinook is different insofar as it leaves the visa officer to make all positive eligibility determinations. Following IRCC's definitions, the program is also not a form of advanced analytics, because it does not make predictions based on data. Indeed, the flag words and risk indicators are inputted by humans by filling out forms to suggest words and indicators and obtaining approval by administrators. In addition, the system does not use machine learning, because its algorithms to display and label data are fixed.

Finally, Chinook arguably is not a form of artificial intelligence,<sup>233</sup> even in the term's simplest sense. While it indeed performs a sorting function usually done by humans, this is not a function that requires great human intelligence. Indeed, in its display functions, Chinook is closer to what IRCC calls an e-tool, which automates a repetitive task, such as a program to autofill a PDF document.<sup>234</sup>

At the same time, witnesses highlighted that the system allows "bulk refusals" in a spreadsheet-like screen.<sup>235</sup> While low-tech, risk indicators and word flags highlight some parts of applications over others. As quoted in the *Le Québec c'est nous aussi* brief, a *Le Devoir* article also highlighted that Chinook "does not retain the notes made by immigration officers in coming to their decisions and does not require the officers to open the evidence that candidates for temporary residency submit."<sup>236</sup> While these functions may affect decisions, IRCC may not know either way. As the department did not and does not consider Chinook to be AI, and able to affect decisions, it did not follow guiding principles for digital transformations in its development, and did not have to subject the software to an Algorithmic Impact Assessment before its release.<sup>237</sup>

Court documents and ATIP disclosures also give no indication that the software currently undergoes quality assurance to examine any potential effects on decision-making and refusal rates, or that IRCC has consulted with outside stakeholders or experts in its development. While an ATIP document mentions the one-time existence of a module entitled "Quality Assurance" for use with Chinook, a September 2020 email indicates that this module has been at least temporarily shelved to address outstanding bugs in

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233 Cross-Examination of Andie Melo Daponte, 4 August 2021, *Abigail Ocran v. The Minister of Citizenship and Immigration*, Federal Court, IMM-6571-20, 17 December 2020, pp. 37–39.

234 *Digital Transformation at IRCC: Benefits, Risks and Guidelines for the Responsible Use of Emergent Technologies*, White Paper, v 1.1, Strategic Policy and Planning, March 2018, p. 8, ATIP.

235 CIMM, *Evidence*, 3 February 2022, 1100 (Wei William Tao).

236 Sarah R. Champagne, "[Un outil informatique mis en cause dans la hausse des refus de permis d'études](#)," *Le Devoir*, 26 November 2021 [AVAILABLE IN FRENCH ONLY]; quoted in *Le Québec c'est nous aussi*, *Brief*, p. 11.

237 CIMM, *Evidence*, 3 February 2022, 1150 (Lou Janssen Dangzalan); CIMM, *Evidence*, 3 February 2022, 1110 (Wei William Tao).

the software. Neither the court documents nor the ATIP disclosures give any details about what this quality assurance module once did.<sup>238</sup> As Lou Janssen Dangzalan testified to the committee, “advanced data analytics actually has some QA [quality assurance] backing it, whereas with Chinook, we have absolutely no idea.”<sup>239</sup>

More recent quality assurance that the department has conducted on the software focuses on efficiency, privacy and addressing possible litigation, rather than on possible effects on decision-making. The ATIP disclosures mention efficiency and functionality testing, software updates to address legal/litigation concerns and a Privacy Risk Action Plan. The legal quality assurance and analysis also seems to have come late in the process. September 2020 emails mention finalizing an affidavit on Chinook with IRCC legal services in case of litigation, and updates to the software that occurred within the previous six to nine months to account for legal and litigation concerns.<sup>240</sup> Speaking of litigation and Chinook, Lou Janssen Dangzalan stated that “in the history of Chinook, we have found out, at least from snippets of emails that we've received through ATIP disclosures, that [the legal] QA, or quality assurance, was actually an afterthought.”<sup>241</sup> Similarly, the *Le Devoir* article wrote that “[Chinook] was created with no legal oversight.”<sup>242</sup> Unlike in its development of the advanced analytics program, the department seems to have conducted legal testing and analysis at a late stage, rather than integrating legal quality assurance into the tool’s creation and development.

Ultimately, if the Chinook tool has little effect on decision-making and refusals, a robust performance and legal quality assurance and consultation process may be unnecessary. Chinook is just an e-tool. But without such a process, officials and stakeholders do not know its effect, and do not understand if it qualifies as AI in the broader sense. Lou Janssen Dangzalan argued that “[t]here needs to be more transparency. Stakeholder engagement is essential, and IRCC should engage with immigration and privacy lawyers.”<sup>243</sup>

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238 When cross-examined on 4 August 2021 in the *Ocran* case about the potential effect of Chinook on rising refusal rates, Andie Melo Daponte, the author of the IRCC affidavit on Chinook, made no mention of testing its affect on refusal rates. Cross-Examination of Andie Melo Daponte, 4 August 2021, *Abigail Ocran v. The Minister of Citizenship and Immigration*, Federal Court, IMM-6571-20, 17 December 2020, pp. 69-94.

239 CIMM, *Evidence*, 3 February 2022, 1125 (Lou Janssen Dangzalan).

240 ATIP 2A-2020-73215, pp. 5-20.

241 CIMM, *Evidence*, 3 February 2022, 1150 (Lou Janssen Dangzalan).

242 Sarah R. Champagne, “[Un outil informatique mis en cause dans la hausse des refus de permis d'études](#),” *Le Devoir*, 26 November 2021 [AVAILABLE IN FRENCH ONLY]; quoted in *Le Québec c'est nous aussi*, *Brief*, p. 11.

243 CIMM, *Evidence*, 3 February 2022, 1105 (Lou Janssen Dangzalan).



As such, the Committee recommends:

**Publish information about Chinook**

**Recommendation 22**

**That Immigration, Refugees and Citizenship Canada publish information on all artificial intelligence software programs and e-tools, including but not limited to Chinook, to ensure better transparency in the department's processing and use of automation.**

**Undertake Public Consultations Regarding New Technologies**

**Recommendation 23**

**That Immigration, Refugees and Citizenship Canada undertake meaningful public consultations on the deployment of new technologies to process immigration applications, including automated technologies, Chinook and artificial intelligence.**

**Conduct a Gender-Based Analysis Plus of Chinook**

**Recommendation 24**

**That Immigration, Refugees and Citizenship Canada conduct a Gender-Based Analysis Plus (GBA+) of the Chinook software program and its impact on the processing of temporary resident visas, and publish a report on the findings.**

**Audit Chinook**

**Recommendation 25**

**That Immigration, Refugees and Citizenship Canada submit the Chinook software program to a third-party audit and publish the audit report.**

**Conduct an Algorithmic Impact Assessment and Independent Race-Equity Review of Chinook**

**Recommendation 26**

**That Immigration, Refugees and Citizenship Canada ensure Chinook goes through a proper algorithmic impact assessment and independent race-equity review.**

## Require Independent Oversight for Chinook and Artificial Intelligence Tools

### Recommendation 27

**That Immigration, Refugees and Citizenship Canada require independent oversight for both Chinook and the expansion of artificial intelligence and offer greater transparency regarding the algorithmic impact assessments, privacy assessments and equity consultations that the processes undergo.**

### Barriers Within the Application Process

Most indirectly, barriers within the application process can affect some groups of applicants more than others. Most simply, some parts of the world are underserved by visa application centres, and applicants must travel far to access biometrics and other document services.<sup>244</sup> For example, as Yan Cimon put it, “biometric fingerprinting services ... are geographically easy to access for international students from Asia, but very difficult to access for international students from Africa.”<sup>245</sup> Similarly, another witness highlighted a lack of visa offices in western Africa.<sup>246</sup> This lack of access means that students often face complicated travel to start their applications, and will sometimes have to return several times to finalize all the paperwork to apply for a study permit. Applicants who must travel further at greater cost to use visa offices and visa application centres are less likely to start an application, less likely to persevere in gathering all the documents, and less likely to have a solid application.

Witnesses similarly hypothesized that the lack of visa offices for application processing in Africa means that the existing centres are overwhelmed.<sup>247</sup> Two witnesses cited the example of the particularly busy processing centre in Dakar, Senegal.<sup>248</sup> Paulin Mulatris argued that such high volumes may lead visa officers to consider each application for shorter periods of time, and become more likely to reject the application:

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244 Université Laval, [Brief](#).

245 CIMM, [Evidence](#), 10 February 2022, 1225 (Yan Cimon).

246 CIMM, [Evidence](#), 1 March 2022, 1200 (François Dornier).

247 CIMM, [Evidence](#), 10 February 2022, 1110 (Paulin Mulatris); 1220 (Luc Bussières); CIMM, [Evidence](#), 3 February 2022, 1250 (Thibault Camara).

248 CIMM, [Evidence](#), 10 February 2022, 1110 (Paulin Mulatris); 1220 (Luc Bussières).



When all those applications are directed to a single country, inevitably that leads to delays. It's not the visa officers' fault, but the sheer number of applications coming in sometimes results in superficial and mechanical processing of applications.<sup>249</sup>

For Paulin Mulatris, a processing bottleneck “probably leads to biases in processing applications, as well as automatic refusals with no proper, consistent analysis of applications.”<sup>250</sup> Similarly, Thibault Camara, President, Le Québec c'est nous aussi, testified that “officers are likely making decisions with discriminatory biases because they want to do things quickly and they are not taking the time to do them properly.”<sup>251</sup> Conversely, refusal rates may be lower in visa offices with more resources to promote some programs and do outreach about the required steps for a given pathway. As an IRCC official put in, in a written response to a question from a Committee member,

Processing offices and overseas offices with sufficient resources have some capacity to promote immigration programs through outreach and recruitment events and thereby ensure that applicants better understand the various pathways available to them resulting in stronger applications.<sup>252</sup>

More well-financed offices “are also able to acquire local knowledge ... and capture the required information to contextualize an application to objectively inform decision makers.”<sup>253</sup> In a similar vein, Lou Janssen Dangzalan highlighted the importance of having one's application assessed by an officer in one's own country to combat racial bias, as the decision maker would be more in tune with the realities of the applicants, and presumably less likely to make decisions based on such biases.<sup>254</sup>

More broadly, the department noted its reduced “capacity to engage with local authorities to validate documentation, to identify potential fraud trends, and to promote immigration programs through migration diplomacy” in regions with a reduced Government of Canada presence and complex geopolitical conditions.<sup>255</sup>

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249 Ibid., 1130 (Paulin Mulatris).

250 Ibid., 1110.

251 CIMM, *Evidence*, 3 February 2022, 1250 (Thibault Camara).

252 IRCC, *CIMM 7.12 Prejudices in Decision Making*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 13 April 2022, p. 1.

253 Ibid.

254 CIMM, *Evidence*, 3 February 2022, 1105 (Lou Janssen Dangzalan).

255 IRCC, *CIMM 7.12 Prejudices in Decision Making*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 13 April 2022, p. 1.

To decrease the onerous application process for some students, three witnesses suggested increased funding and capacity for visa offices, particularly during peak student permit processing season.<sup>256</sup>

Considering the barriers to the application process, the Committee recommends:

**Provide Additional Resources and Infrastructure for Processing in Africa and South Asia**

**Recommendation 28**

**That Immigration, Refugees and Citizenship Canada provide additional resources for immigration processing in visa offices currently in Africa and South Asia, review its international network and add additional visa offices or visa application centres in Africa and South Asia.**

**Conduct Blind Reviews of a Sample of Applications**

**Recommendation 29**

**That Immigration, Refugees and Citizenship Canada conduct regular blind reviews of a sample of applications from random visa offices in each region of the department's international network to verify consistency in decision-making.**

Several witnesses recommended to the Committee that IRCC create an ombudsperson to oversee the department's activities.<sup>257</sup> For one witness, the ombudsperson would study the directives given to IRCC's visa officers to ensure there is no systemic discrimination in their decision-making. Another witness suggested an ombudsperson would automatically audit offices with high refusal rates as part of their mandate. More broadly, the Committee heard that an ombudsperson would foster greater transparency and clarity at IRCC. As it stands, applicants who wish to seek a refusal overturned have two avenues: they can request a reconsideration of their application by IRCC, or they can bring the case before the Federal Court. In support of the establishment of the ombudsperson position, witnesses have highlighted the importance of independence

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256 CIMM, [Evidence](#), 3 February 2022, 1120 (Christian Fotang); 1135 (Paulin Mulatris); ); CIMM, [Evidence](#), 3 February 2022, 1250 (Thibault Camara).

257 CIMM, [Evidence](#), 8 February 2022, 1155 (Gideon Christian); CIMM, [Evidence](#), 10 February 2022, 1135 (Paulin Mulatris); CIMM, [Evidence](#), 3 February 2022, 1225 (Thibault Camara); 1300 (Alain Dupuis); 1125, 1105 (Lou Janssen Dangzalan).



and simplicity in review and noted that the Court option is cost prohibitive for most applicants.<sup>258</sup>

As such, the Committee recommends:

### **Establish an Ombudsperson Office at Immigration, Refugees and Citizenship Canada**

#### **Recommendation 30**

**That Immigration, Refugees and Citizenship Canada establish an ombudsperson office to oversee the department's immigration operations and policies.**

### **Provide Appropriate Resources for the Establishment of an Ombudsperson Office**

#### **Recommendation 31**

**That Immigration, Refugees and Citizenship Canada provide the appropriate resources for the establishment of an ombudsperson's office to review the department's policies, receive and review complaints, review regular reports on racism and training procedures; and that the office be empowered to take appropriate enforcement measures in relation to these activities.**

## **CHAPTER 4: INTEGRATION AND RETENTION**

The Committee heard from several witnesses about how important international students were in light of the current labour shortages and demographic decline in Canada. In this light, witnesses told the Committee how to best support students to succeed and thrive in Canada.

### **The Current Labour Market**

Leah Nord of the Canadian Chamber of Commerce described the current labour shortage as a crisis:

We have an unprecedented and I dare say unfathomable one million job vacancies in Canada. Vacancies in health care, construction, manufacturing, accommodation and food services along with retail trade are currently leading the way, yet we have shortages across sectors, communities and regions affecting every size of business.

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258 CIMM, *Evidence*, 1 March 2022, 1130 (François Dornier); CIMM, *Evidence*, 3 February 2022, 1110 (Wei William Tao); 1215 (Thibault Camara).

Businesses, including small businesses, are citing labour shortages as often one of their most significant barriers to economic growth.<sup>259</sup>

In Quebec City, Yan Cimon spoke of the labour shortage and the unemployment rate that provide opportunities to African students in his region:

When we look at this issue, we can see that foreign students, such as African students—since this is the topic of today’s discussion—who come to study often have opportunities to settle here. They often have many opportunities. For example, our area has a labour shortage and our unemployment rate is far below the provincial average. Businesses need this highly skilled workforce. Above all, it’s important to help these students come and study here, to access an education in Canada and to take advantage of economic opportunities.<sup>260</sup>

Luc Bussières told the Committee that international students who stay in northern Ontario, a region challenged by demographic decline and the labour shortage, “constitute an extremely significant added value”<sup>261</sup>:

About a third of them come to Canada for a second university degree. The others are at the undergraduate level. They spend three, four or five years with us. They are then integrated, trained, and ready to work.<sup>262</sup>

Denise Amyot presented a recommendation to the Committee that she believes would likely increase the number of students in rural and remote areas where labour shortages are acute:

IRCC should consider implementing a demand driven study permit stream that would give priority to applicants who have a job offer conditional on graduation.<sup>263</sup>

To address the structural issues of Canada’s labour shortage, Leah Nord spoke of building “talent pipelines” for “qualified, credentialed, acclimatized” students who want to stay.<sup>264</sup>

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259 CIMM, *Evidence*, 8 February 2022, 1220 (Leah Nord).

260 CIMM, *Evidence*, 10 February 2022, 1245 (Yan Cimon).

261 CIMM, *Evidence*, 10 February 2022, 1245 (Luc Bussières).

262 *Ibid.*, 1220.

263 CIMM, *Evidence*, 8 February 2022, 1230 (Denise Amyot).

264 CIMM, *Evidence*, 8 February 2022, 1220 (Leah Nord).



## Measures to Integrate International Students

Learning institutions, provinces and the federal government have a role to play in measures to facilitate integration. Witnesses spoke of specific work-related issues and settlement services as well as people-to-people ties. Luc Bussi eres explained the outcome of supporting students throughout their experience in this way:

We are seeing an excellent retention rate of students after they complete their studies. I was saying that about 50% of them find a job in northern Ontario, where they were not expected. Many people are wondering how we are managing to welcome people in small northern communities, in regions that are pretty ethnically homogenous. ... Our strategy consists in welcoming them and helping them complete their studies, but also in helping them integrate into the community, remain in good mental health and maintain a sense of well-being. They have [*technical difficulties*] stayed on, even though they were doubtful in the beginning. Some of them arrive in January, when it is -40 C. They tell themselves they could never survive in that environment, but, a few years later, they want to settle in the region, and they begin to adopt our habits and wear half open coats in the winter.<sup>265</sup>

## Canadian Work Experience

International students enrolled full-time can obtain Canadian work experience through working on campus,<sup>266</sup> working off campus for a limited number of hours<sup>267</sup> and working after graduation through the post-graduate work permit program (PGWPP).<sup>268</sup> For other work off campus during their studies (i.e., in addition to the restricted hours), a foreign student must apply for a work permit.

The post-graduation work permit (PGWP) is offered once in a lifetime to students, and its length is commensurate to the length of the studies.<sup>269</sup> Its purpose is to allow international students to gain work experience in their field of study. Paulin Mulatris said that “[a]ll international students who graduate in Canada receive a letter asking them if they intend to obtain a work permit related to their degree.”<sup>270</sup> Martin Basiri told the Committee that “[o]ur institutions, immigration system and government all promote the

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265 CIMM, [Evidence](#), 10 February 2022, 1230 (Luc Bussi eres).

266 IRCC, [Work on campus](#).

267 IRCC, [Work off campus as an international student](#).

268 IRCC, [Work in Canada after you graduate: Who can apply](#).

269 IRCC, [Post-Graduate Work Permit Program \(PGWPP\)](#).

270 CIMM, [Evidence](#), 10 February 2022, 1145 (Paulin Mulatris).

post-graduation work permit pathway to stay and work in Canada legally after graduation.”<sup>271</sup>

IRCC took several measures during the COVID-19 pandemic, including offering flexibility within the PGWPP and assuring students they would qualify for a post-graduate work permit even if they had spent more than 50% of their program abroad. Both Leah Nord and Carole St. Laurent expressed the wish for this flexibility to become a permanent fixture of the PGWPP.<sup>272</sup> Pirita Mattola told the Committee, however, that students who had studied remotely during the pandemic were unsure about the length of their post-graduate work permit.<sup>273</sup>

With respect to other means of acquiring Canadian work experience, Pirita Mattola told the Committee that students “should be able to contribute to the workforce a little more during their studies.”<sup>274</sup> This idea includes allowing students to work more hours than the 20 hours off campus during their study session and facilitating co-op and work-integrated learning.<sup>275</sup>

Shamira Madhany informed the Committee that for students’ work experience to count towards the Express Entry stream, the main pathway to permanent residence, they need to have experience matching their acquired high skills from their Canadian education. To have access to these jobs, they require more flexibility in the number of hours they can work.<sup>276</sup>

Several witnesses argued that international students should be able to work in internships or co-op, obtaining a social number seamlessly and without requiring an additional work permit.<sup>277</sup> The importance of this type of hands-on learning was highlighted by Carole St. Laurent:

The strong linkages with industry and employment is something that students seek. ... The small class size, the integration into the community and the hands-on experience are very attractive for students. All students have either a co-op experience or some

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271 CIMM, [Evidence](#), 8 February 2022, 1215 (Martin Basiri).

272 CIMM, [Evidence](#), 8 February 2022, 1220 (Leah Nord); CIMM, [Evidence](#), 10 February 2022, 1105 (Carole St. Laurent).

273 CIMM, [Evidence](#), 10 February 2022, 1115 (Pirita Mattola).

274 Ibid., 1150; CIMM, [Evidence](#), 8 February 2022, 1220 (Leah Nord).

275 CIMM, [Evidence](#), 10 February 2022, 1115 (Pirita Mattola).

276 CIMM, [Evidence](#), 1 March 2022, 1210 (Shamira Madhany).

277 CIMM, [Evidence](#), 3 February 2022, 1120 (Christian Fotang); CIMM, [Evidence](#), 8 February 2022, 1220 (Leah Nord).



type of not only academic, but also hands-on experience to better prepare them for their jobs. ... More than 90% of students get jobs in their area of study. That's really important to international students.<sup>278</sup>

Witnesses also suggested that international students be allowed to qualify for the Canada Summer Jobs Program.<sup>279</sup>

The Minister told the Committee that he was considering the many options put forward in light of the labour shortage and the desire for an even stronger recovery post-pandemic.<sup>280</sup> He reminded the Committee that:

The purpose of a study permit is to bring people who want to study at a legitimate learning institution so that they can develop their skills and potentially even apply to become a permanent resident subsequently. If we increase or remove the cap on hours altogether through a study permit, I expect that we would see a lot of people then try to come in not for the purpose of studying but for the purpose of working. ... I think we have to maintain our focus to ensure that whatever we do on the limit of hours worked, it's to promote that person's ability to gain a quality education in Canada.<sup>281</sup>

Pemi Gill of IRCC explained that the challenge for co-op students occurs when they “have not sought the work permit at the same time as the study permit.”<sup>282</sup>

In light of this testimony, the Committee would like to recommend the following:

### **Issue Work Permits to Students in Co-op Programs**

#### **Recommendation 32**

**That Immigration, Refugees and Citizenship Canada issue a work permit automatically and at no extra cost at the same time as study permits for students enrolled in a co-op program.**

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278 CIMM, *Evidence*, 10 February 2022, 1150 (Carole St. Laurent).

279 CIMM, *Evidence*, 3 February 2022, 1120 (Christian Fotang); CIMM, *Evidence*, 8 February 2022, 1220 (Leah Nord), *Undergraduates of Canadian Research-Intensive Universities, Brief*, p. 7.

280 CIMM, *Evidence*, 17 February 2022, 1120 (Hon. Sean Fraser).

281 *Ibid.*, 1145.

282 CIMM, *Evidence*, 17 February 2022, 1220 (Pemi Gill).

## **Not Require Work Permits for Work-Integrated Learning**

### **Recommendation 33**

**That Immigration, Refugees and Citizenship Canada recognize that students enrolling in specific learning programs will be doing work-integrated learning, such as internships, and that in the context of these studies no work permit is necessary.**

## **Develop a Special Program for International Students Without Financial Means**

### **Recommendation 34**

**That Immigration, Refugees and Citizenship Canada develop a special program that would allow international students without financial means to come to Canada and work full-time on an open work permit while studying part-time, and that Immigration, Refugees and Citizenship Canada review the requirements to ensure that these students are not disqualified from the Post-Graduate Work Permit Program.**

## **Settlement Services**

Settlement services are varied and usually include orientation and employment services such as résumé writing. Service providers work with specific clientele to help them adapt to Canada. IRCC funds multiple agencies across Canada but, currently, students are not entitled to these services. Learning institutions and the provinces usually step in.

Yan Cimon told the Committee that Université Laval assisted their international students in networking with positive results:

We also have tools to help them integrate into the community, including various activities and various partnerships with businesses and groups in the region. ... We have implemented a set of mechanisms that enable us to help students become very active and succeed in our communities. ... I would point out that, in our region, institutions and organizations of an economic nature are actively working on [attracting] and hiring international students.<sup>283</sup>

Currently, settlements services funded by IRCC are only available to permanent residents. Witnesses suggested that international students on the pathway to permanent residence should have the same access to settlement services.<sup>284</sup> Going

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283 CIMM, *Evidence*, 10 February 2022, 1225, 1230 (Yan Cimon).

284 CIMM, *Evidence*, 1 March 2022, 1115 (Shamira Madhany); CIMM, *Evidence*, 8 February 2022, 1220 (Leah Nord); Ontario Council of Agencies Serving Immigrants, *Brief*, p. 2.



further, Shamira Madhany told the Committee that IRCC should be funding settlement agencies and post-secondary institutions to provide settlement services to international students.

Pirita Mattola reminded the Committee that, in rural settings, international students, who often do not have driving licenses, may have issues with access to transportation, which settlement services could assist with.<sup>285</sup>

Considering this testimony, the Committee recommends:

### **Fund Tailored Settlement Services for International Students**

#### **Recommendation 35**

**That Immigration, Refugees and Citizenship Canada partially fund tailored settlement services for international students on their path to permanent residency, as well as parallel sponsorship measures for those who want to obtain permanent residency.**

### **People-to-People Ties**

The Committee also heard from several witnesses that welcoming international students establishes strong people-to-people ties between countries and communities, which can be part of the decision-making process for foreign students when they consider studying and living abroad. For example, H.E. Khalilur Rahman told the Committee that “Bangladesh has very good relations with the province of Saskatchewan.”<sup>286</sup> In addition to good trade relations, the High Commissioner underlined that

Bangladeshi students can contribute in a big way to the economy of Saskatchewan, as basically the province is an agricultural-based province and we have a huge sector, and these kinds of students can contribute for both Saskatchewan and Bangladesh if they get the opportunity.<sup>287</sup>

He also highlighted that Bangladeshi Canadians share their experiences of living in Saskatoon with “their extended family members and neighbours in Bangladesh who want to come to Canada to study at [University of Saskatchewan].”<sup>288</sup>

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285 CIMM, *Evidence*, 10 February 2022, 1125 (Pirita Mattola).

286 CIMM, *Evidence*, 8 February 2022, 1140 (Khalilur Rahman).

287 Ibid.

288 Ibid.

Several witnesses believed that these people-to-people ties can be developed into lifelong relations that benefit Canada's overall economy as well as local communities, large and small, across the country.<sup>289</sup> H.E. Khalilur Rahman told the Committee that there are many potential international students from Bangladesh willing to establish themselves in smaller communities across Canada.<sup>290</sup> Pirita Mattola added that foreign students who come from "more collectivist cultures" have "a very strong community orientation."<sup>291</sup> In addition, she noted that "international students are highly motivated and very entrepreneurial" and are highly interested "in business ownership, whether it is in taking over existing businesses or starting their own businesses."<sup>292</sup> Finally, Martin Basiri believed that any Canadian community can have the "opportunity to take a lot of international students. All it takes is the right sales and marketing and positioning our good institutions."<sup>293</sup>

## CONCLUSION

In conclusion, the Committee would like to thank all the witnesses that took the time to appear and submit documents as part of this study. Your time and effort to inform us, and the public, about these important issues are greatly appreciated.

Throughout the study, the Committee learned greatly from witness testimony about the significant impact of processing delays and high refusal rates on Canadian learning institutions, as well as on communities and individuals around the world. The Committee will continue to pursue these issues in its future studies.

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289 CIMM, [Evidence](#), 1 February 2022, 1145 (Larissa Bezo); 1250 (Paul Davidson); CIMM, [Evidence](#), 8 February 2022, 1145 (Khalilur Rahman); CIMM, [Evidence](#), 10 February 2022, 1115 (Pirita Mattola).

290 CIMM, [Evidence](#), 8 February 2022, 1145 (Khalilur Rahman).

291 CIMM, [Evidence](#), 10 February 2022, 1115 (Pirita Mattola).

292 Ibid.

293 CIMM, [Evidence](#), 8 February 2022, 1305 (Martin Basiri),



## APPENDIX A: IMMIGRATION, REFUGEES AND CITIZENSHIP CANADA STATISTICS ON THE REASONS FOR REFUSAL GIVEN DURING THE 2019-2021 PERIOD

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The tables in Annex A were submitted by IRCC to provide a comprehensive picture of the “reasons for refusal for study permit applications processed between 1 January 2019 and 31 December 2021, including for clients residing in Africa who have identified French as their official language.”<sup>1</sup>

The departments highlighted

that more than one refusal ground may apply to a single application, [and] therefore the annex shows each instance of a reason being applied. In addition, refusal grounds include legacy categories used in past era systems. As a result, there are redundant category breakdowns for certain refusal grounds, such as the case with A16.<sup>2</sup>

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1 IRCC, *CIMM 7.7 Reasons for refusal statistics*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 4 April 2022, p. 1.

2 Ibid.

**Table 1—Reasons for refusal for Study Permit Applications Processed between January 1, 2019-December 31, 2021 (in instances)\***

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1)</b>	From the documents which you have submitted in support of your application, I am not satisfied that you have answered all questions truthfully, as required by subsection 16(1) of the Act. Specifically, I am not satisfied that the following information is truthful:	38	0	0	38
<b>A16(1)</b>	I am not satisfied that you have answered truthfully all questions put to you.	1	0	0	1
<b>A16(1)</b>	I am not satisfied that you have sufficient funds, including income or assets, to carry out your stated purpose in going to Canada or to maintain yourself while in Canada and to effect your departure.	8	0	0	8
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: An interview	1	0	0	1
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: Biometrics	4	0	0	4

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: Completion of a medical examination	10	1	0	11
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: The following documents:	15	0	0	15
<b>A16(1)</b>	You have not provided sufficient documentation to support your / your host's income and assets.	1	0	0	1
<b>A16(1)</b>	You have submitted documentation which lacks authenticity as part of your application. This has diminished the overall credibility of your submission.	72	0	0	72
<b>A16(1) Total</b>	<b>N/A</b>	<b>150</b>	<b>1</b>	<b>0</b>	<b>151</b>
<b>A16(1) Authenticity</b>	You have submitted documentation that lacks authenticity as part of your application. This has diminished the overall credibility of your submission.	1,004	216	632	1,852
<b>A16(1) Authenticity Total</b>	<b>N/A</b>	<b>1,004</b>	<b>216</b>	<b>632</b>	<b>1,852</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1) Biometrics</b>	You have not complied with our request for information, per subsection 16(1) of the IRPA. To date, you have failed to comply with our request for biometrics.	1,075	125	2,572	3,772
<b>A16(1) Biometrics Total</b>	<b>N/A</b>	<b>1,075</b>	<b>125</b>	<b>2,572</b>	<b>3,772</b>
<b>A16(1) Documents</b>	You have not complied with our request for information, per subsection 16(1) of the IRPA. To date, you have failed to comply with our request for submission of the following documents:	2,282	337	5,176	7,795
<b>A16(1) Documents Total</b>	<b>N/A</b>	<b>2,282</b>	<b>337</b>	<b>5,176</b>	<b>7,795</b>
<b>A16(1) Host Income</b>	You have not provided sufficient documentation to support your or your host's income and assets.	616	93	577	1,286
<b>A16(1) Host Income Total</b>	<b>N/A</b>	<b>616</b>	<b>93</b>	<b>577</b>	<b>1,286</b>
<b>A16(1) Suf. Fund</b>	I am not satisfied that you have sufficient funds, including income or assets, to carry out your stated purpose in coming to Canada or to maintain yourself while in Canada and to effect your departure.	6,000	2,541	2,709	11,250
<b>A16(1) Suf. Fund Total</b>	<b>N/A</b>	<b>6,000</b>	<b>2,541</b>	<b>2,709</b>	<b>11,250</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1) Truthful</b>	I am not satisfied that you have truthfully answered all questions in the documents you have submitted in support of your application, as required by subsection 16(1) of the IRPA. Specifically, I am not satisfied that the following information is truthful:	1,234	593	976	2,803
<b>A16(1) Truthful Total</b>	<b>N/A</b>	<b>1,234</b>	<b>593</b>	<b>976</b>	<b>2,803</b>
<b>A16(1)(a)</b>	I am not satisfied that you have truthfully answered all questions asked of you.	1,453	486	745	2,684
<b>A16(1)(a) Total</b>	<b>N/A</b>	<b>1,453</b>	<b>486</b>	<b>745</b>	<b>2,684</b>
<b>A16(1.1) Examination</b>	You have not complied with our request for information, per subsection 16(1.1) of the IRPA. To date, you have failed to comply with our request for an examination.	114	18	200	332
<b>A16(1.1) Examination Total</b>	<b>N/A</b>	<b>114</b>	<b>18</b>	<b>200</b>	<b>332</b>
<b>A16(1.1) Interview</b>	You have not complied with our request for information, per subsection 16(1.1) of the IRPA. To date, you have failed to comply with our request for an interview.	5	2	0	7
<b>A16(1.1) Interview Total</b>	<b>N/A</b>	<b>5</b>	<b>2</b>	<b>0</b>	<b>7</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(2)</b>	You have not complied with our request for information, per subsection 16(2) of the IRPA. To date, you have failed to comply with our request for completion of a medical examination.	2	0	6	8
<b>A16(2) Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>6</b>	<b>8</b>
<b>A16(2) Medical Exam</b>	You have not complied with our request for information, per subsection 16(2) of the IRPA. To date, you have failed to comply with our request for completion of a medical examination.	162	62	471	695
<b>A16(2) Medical Exam Total</b>	<b>N/A</b>	<b>162</b>	<b>62</b>	<b>471</b>	<b>695</b>
<b>A16(2.1)</b>	You have not complied with our request for information, per subsection 16(2.1) of the IRPA. To date, you have failed to comply with our request for a Canadian Security Intelligence Service (CSIS) interview.	1	0	0	1
<b>A16(2.1) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>A22.1(1)</b>	You are found inadmissible to Canada under subsection 22.1(1) of that IRPA: the Minister may, on the Minister's own initiative, declare that a foreign national, other than a foreign national referred to in section 19, may not become a temporary resident if the Minister is of the opinion that it is justified by public policy considerations.	0	0	1	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A22.1(1) Total</b>	<b>N/A</b>	0	0	1	1
<b>A34(1)(a)</b>	You are found inadmissible to Canada under paragraph 34(1)(a) of the IRPA: engaging in an act of espionage that is against Canada or that is contrary to Canada's interests.	21	0	0	21
<b>A34(1)(a) Total</b>	<b>N/A</b>	21	0	0	21
<b>A34(1)(b.1)</b>	You are found inadmissible to Canada under paragraph 34(1)(b.1) of the IRPA: engaging in an act of subversion against a democratic government, institution or process as they are understood in Canada.	1	0	0	1
<b>A34(1)(b.1) Total</b>	<b>N/A</b>	1	0	0	1
<b>A34(1)(f)</b>	You are found inadmissible to Canada under paragraph 34(1)(f) of the IRPA: being a member of an organization that there are reasonable grounds to believe engages, has engaged or will engage in acts referred to in paragraph (a), (b), (b.1) or (c).	2	0	0	2
<b>A34(1)(f) Total</b>	<b>N/A</b>	2	0	0	2

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A35(1)(b)</b>	You are found inadmissible to Canada under paragraph 35(1)(b) of the IRPA: being a prescribed senior official in the service of a government that, in the opinion of the Minister, engages or has engaged in terrorism, systematic or gross human rights violations, or genocide, a war crime or a crime against humanity within the meaning of subsections 6(3) to (5) of the <i>Crimes Against Humanity and War Crimes Act</i> .	1	0	0	1
<b>A35(1)(b) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>A36(1)(a)</b>	A36(1)(a): Having been convicted in Canada of an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years, or of an offence under an Act of Parliament for which a term of imprisonment of more than six months has been imposed;	1	0	0	1
<b>A36(1)(a)</b>	You are found inadmissible to Canada under paragraph 36(1)(a) of the IRPA: having been convicted in Canada of an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years, or of an offence under an Act of Parliament for which a term of imprisonment of more than six months has been imposed.	0	0	1	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A36(1)(a) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>A36(1)(b)</b>	You are found inadmissible to Canada under paragraph 36(1)(b) of the IRPA: having been convicted of an offence outside Canada that, if committed in Canada, would constitute an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years.	10	3	2	15
<b>A36(1)(b) Total</b>	<b>N/A</b>	<b>10</b>	<b>3</b>	<b>2</b>	<b>15</b>
<b>A36(1)(c)</b>	A36(1)(c): Committing an act outside Canada that is an offence in the place where it was committed and that, if committed in Canada, would constitute an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years.	1	0	0	1
<b>A36(1)(c)</b>	You are found inadmissible to Canada under paragraph 36(1)(c) of the IRPA: committing an act outside Canada that is an offence in the place where it was committed and that, if committed in Canada, would constitute an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years.	4	0	3	7
<b>A36(1)(c) Total</b>	<b>N/A</b>	<b>5</b>	<b>0</b>	<b>3</b>	<b>8</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A36(2)(a)</b>	You are found inadmissible to Canada under paragraph 36(2)(a) of the IRPA: having been convicted in Canada of an offence under an Act of Parliament punishable by way of indictment, or of two offences under any Act of Parliament not arising out of a single occurrence.	2	0	0	2
<b>A36(2)(a) Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>A36(2)(b)</b>	You are found inadmissible to Canada under paragraph 36(2)(b) of the IRPA: having been convicted outside Canada of an offence that, if committed in Canada, would constitute an indictable offence under an Act of Parliament, or of two offences not arising out of a single occurrence that, if committed in Canada, would constitute offences under an Act of Parliament.	19	4	8	31
<b>A36(2)(b) Total</b>	<b>N/A</b>	<b>19</b>	<b>4</b>	<b>8</b>	<b>31</b>
<b>A36(2)(c)</b>	You are found inadmissible to Canada under paragraph 36(2)(c) of the IRPA: committing an act outside Canada that is an offence in the place where it was committed and that, if committed in Canada, would constitute an indictable offence under an Act of Parliament.	8	2	33	43
<b>A36(2)(c) Total</b>	<b>N/A</b>	<b>8</b>	<b>2</b>	<b>33</b>	<b>43</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A38(1)(a)</b>	You are found inadmissible to Canada under paragraph 38(1)(a) of the IRPA: likely to be a danger to public health.	2	1	4	7
<b>A38(1)(a) Total</b>	<b>N/A</b>	<b>2</b>	<b>1</b>	<b>4</b>	<b>7</b>
<b>A38(1)(c)</b>	You are found inadmissible to Canada under paragraph 38(1)(c) of the IRPA: might reasonably be expected to cause excessive demand on health or social services.	1	0	5	6
<b>A38(1)(c) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>5</b>	<b>6</b>
<b>A39</b>	A39: You are or will be unable or unwilling to support yourself or any other person who is dependent on you, and have not satisfied an officer that adequate arrangements for care and support, other than those that involve social assistance, have been made.	4	0	0	4
<b>A39</b>	You are found inadmissible to Canada under section 39 of the IRPA: you are or will be unable or unwilling to support yourself or any other person who is dependent on you, and have not satisfied an officer that adequate arrangements for care and support, other than those that involve social assistance, have been made.	81	4	18	103
<b>A39 Total</b>	<b>N/A</b>	<b>85</b>	<b>4</b>	<b>18</b>	<b>107</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A40(1)(a)</b>	A40(1)(a): For directly or indirectly misrepresenting or withholding material facts relating to a relevant matter that induces or could induce an error in the administration of this Act;	147	0	0	147
<b>A40(1)(a)</b>	You have been found inadmissible to Canada in accordance with paragraph 40(1)(a) of the <i>Immigration and Refugee Protection Act</i> (IRPA) for directly or indirectly misrepresenting or withholding material facts relating to a relevant matter that induces or could induce an error in the administration of the IRPA. In accordance with paragraph A40(2)(a), you will remain inadmissible to Canada for a period of five years from the date of this letter or from the date a previous removal order was enforced.	4,986	1,617	4,073	10,676
<b>A40(1)(a) Total</b>	<b>N/A</b>	<b>5,133</b>	<b>1,617</b>	<b>4,073</b>	<b>10,823</b>
<b>A40(2)(a)</b>	A40(1)(a) and A40(2)(a): You are still inadmissible to Canada as a period of five years has not passed since your prior refusal.	5	0	0	5
<b>A40(2)(a)</b>	A40(1)(a) and A40(2)(a): You are still inadmissible to Canada as a period of two years has not passed since your prior refusal.	1	0	0	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A40(2)(a)</b>	At a prior refusal, you were found inadmissible to Canada for misrepresentation. In accordance with paragraph 40(2)(a) of the <i>Immigration and Refugee Protection Act</i> (IRPA), you remain inadmissible for a period of five years from the date of your prior refusal or from the date a previous removal order was enforced.	418	269	299	986
<b>A40(2)(a) Total</b>	<b>N/A</b>	<b>424</b>	<b>269</b>	<b>299</b>	<b>992</b>
<b>A41(a)</b>	You are found inadmissible to Canada under paragraph 41(a) of the IRPA: through an act or omission which contravenes, directly or indirectly, a provision of this Act.	580	38	369	987
<b>A41(a) Total</b>	<b>N/A</b>	<b>580</b>	<b>38</b>	<b>369</b>	<b>987</b>
<b>A42(1)(a)</b>	You are found inadmissible to Canada under paragraph 42(1)(a) of the IRPA: your family member is inadmissible.	4	0	1	5
<b>A42(1)(a) Total</b>	<b>N/A</b>	<b>4</b>	<b>0</b>	<b>1</b>	<b>5</b>
<b>A42(1)(b)</b>	You are found inadmissible to Canada under paragraph 42(1)(b) of the IRPA: you are an accompanying family member of an inadmissible person.	4	3	8	15
<b>A42(1)(b) Total</b>	<b>N/A</b>	<b>4</b>	<b>3</b>	<b>8</b>	<b>15</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>General (Expired SP - WP)</b>	Your study permit has expired; therefore, you are not eligible for a work permit under this program.	0	1	0	1
<b>General (Expired SP - WP) Total</b>	<b>N/A</b>	<b>0</b>	<b>1</b>	<b>0</b>	<b>1</b>
<b>General (Letter of Acceptance)</b>	Your letter of acceptance indicates that you applied more than one month prior to the beginning of your employment.	1	0	0	1
<b>General (Letter of Acceptance) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>Other**</b>	Unspecified	58,093	42,950	90,090	191,133
<b>Other Total</b>	<b>N/A</b>	<b>58,093</b>	<b>42,950</b>	<b>90,090</b>	<b>191,133</b>
<b>R1(1) (Marital status)</b>	You have not established that you are the spouse or that you meet the definition of common-law partner, as defined in the IRPR.	0	1	2	3
<b>R1(1) (Marital status) Total</b>	<b>N/A</b>	<b>0</b>	<b>1</b>	<b>2</b>	<b>3</b>
<b>R11(2) VO Application</b>	Pursuant to subsection 11(2) of the IRPR, an application for this type of document cannot be submitted within Canada. An application of this type must be made at a Canadian visa office in another country.	5	3	0	8

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R11(2) VO Application Total</b>	<b>N/A</b>	<b>5</b>	<b>3</b>	<b>0</b>	<b>8</b>
<b>R11(2) VO Application Total</b>	current employment situation	4	0	0	4
<b>R11(2) VO Application Total</b>	employment prospects in country of residence	4	0	0	4
<b>R11(2) VO Application Total</b>	family ties in Canada and in country of residence	25	0	0	25
<b>R11(2) VO Application Total</b>	Having a legitimate business purpose in Canada	5	0	0	5
<b>R11(2) VO Application Total</b>	I am not satisfied that you have answered truthfully all questions put to you.	1	0	0	1
<b>R179</b>	I am not satisfied that you have sufficient funds, including income or assets, to carry out your stated purpose in going to Canada or to maintain yourself while in Canada and to effect your departure.	8	0	0	8
<b>R179</b>	I am not satisfied that you have truthfully answered all questions asked of you.	415	135	149	699
<b>R179</b>	Limited employment prospects in your country of residence	4	0	0	4
<b>R179</b>	personal assets and financial status	5	0	0	5
<b>R179</b>	Purpose of visit	159	0	0	159

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179</b>	That you have a legitimate business purpose in Canada	5	0	0	5
<b>R179</b>	travel history	24	0	0	24
<b>R179</b>	Your current employment situation	4	0	0	4
<b>R179</b>	Your family ties in Canada and in your country of residence	25	0	0	25
<b>R179</b>	Your personal assets and financial status	5	0	0	5
<b>R179</b>	Your travel history	24	0	0	24
<b>R179 Total</b>	<b>N/A</b>	<b>717</b>	<b>135</b>	<b>149</b>	<b>1,001</b>
<b>R179(1)b)</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, based on the length of your proposed stay in Canada.	160	12	3	175
<b>R179(1)b) Total</b>	<b>N/A</b>	<b>160</b>	<b>12</b>	<b>3</b>	<b>175</b>
<b>R179(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your personal assets and financial status.	1,593	490	747	2,830
<b>R179(b) Assets Total</b>	<b>N/A</b>	<b>1,593</b>	<b>490</b>	<b>747</b>	<b>2,830</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179(b) Conditions</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	38	21	7	66
<b>R179(b) Conditions Total</b>	<b>N/A</b>	<b>38</b>	<b>21</b>	<b>7</b>	<b>66</b>
<b>R179(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the limited employment prospects in your country of residence.	462	248	93	803
<b>R179(b) CoR Employment Total</b>	<b>N/A</b>	<b>462</b>	<b>248</b>	<b>93</b>	<b>803</b>
<b>R179(b) Cur. Employment</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your current employment situation.	519	236	112	867
<b>R179(b) Cur. Employment Total</b>	<b>N/A</b>	<b>519</b>	<b>236</b>	<b>112</b>	<b>867</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your family ties in Canada and in your country of residence.	1,764	874	436	3,074
<b>R179(b) Family Ties Total</b>	<b>N/A</b>	<b>1,764</b>	<b>874</b>	<b>436</b>	<b>3,074</b>
<b>R179(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your immigration status.	176	44	20	240
<b>R179(b) Immigration Status Total</b>	<b>N/A</b>	<b>176</b>	<b>44</b>	<b>20</b>	<b>240</b>
<b>R179(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the length of your proposed stay in Canada.	1,824	1,330	126	3,280
<b>R179(b) Length of Stay Total</b>	<b>N/A</b>	<b>1,824</b>	<b>1,330</b>	<b>126</b>	<b>3,280</b>
<b>R179(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the purpose of your visit.	4,707	3,220	1,680	9,607

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179(b) Purpose Total</b>	<b>N/A</b>	<b>4,707</b>	<b>3,220</b>	<b>1,680</b>	<b>9,607</b>
<b>R179(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your travel history.	2,716	280	179	3,175
<b>R179(b) Travel History Total</b>	<b>N/A</b>	<b>2,716</b>	<b>280</b>	<b>179</b>	<b>3,175</b>
<b>R179(d)</b>	I am not satisfied that you have a legitimate business purpose in Canada.	3	4	1	8
<b>R179(d) Total</b>	<b>N/A</b>	<b>3</b>	<b>4</b>	<b>1</b>	<b>8</b>
<b>R181(1)</b>	Your status as a temporary resident has expired. You did not submit an application for extension of your temporary resident status on or before the expiry of the authorized period.	1	1	1	3
<b>R181(1) Total</b>	<b>N/A</b>	<b>1</b>	<b>1</b>	<b>1</b>	<b>3</b>
<b>R182 Expired Stay</b>	You have not complied with an imposed condition, and, as a result, you have lost your status as a temporary resident because the time period you were allowed to stay in Canada has expired.	2	0	0	2
<b>R182 Expired Stay Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R182 Studies</b>	You have not complied with an imposed condition, and, as a result, you have lost your status as a temporary resident because you have engaged in studies that were prohibited in the conditions imposed.	1	0	0	1
<b>R182 Studies Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R183(1)</b>	You have worked or studied in Canada without authorization and, therefore, have violated a condition imposed under subsection 183(1) of the IRPR.	11	2	1	14
<b>R183(1) Total</b>	<b>N/A</b>	<b>11</b>	<b>2</b>	<b>1</b>	<b>14</b>
<b>R186</b>	You have not demonstrated that you come within the exceptions under section 186 of the IRPR exempting you from the requirement to obtain a work permit or that your employment in Canada comes within the exceptions to section 203 of the IRPR. As a result, your offer of employment must be the subject of an economic effect determination before a work permit can be issued to you. Your employer in Canada should contact the local office of the Department of Employment and Social Development Canada to begin this process.	0	2	3	5
<b>R186 Total</b>	<b>N/A</b>	<b>0</b>	<b>2</b>	<b>3</b>	<b>5</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R186(v) (previous conditions)</b>	You have failed to comply with the terms and conditions of your previous off-campus work permit; therefore, you are not eligible to work off-campus.	1	0	0	1
<b>R186(v) (previous conditions) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R186(w) (Completed studies)</b>	You have not provided evidence that you have satisfied all requirements of the program of studies, as you have not submitted the required documentation in regard to the completion of your studies.	1	1	2	4
<b>R186(w) (Completed studies) Total</b>	<b>N/A</b>	<b>1</b>	<b>1</b>	<b>2</b>	<b>4</b>
<b>R186(w) (Institute qualified)</b>	The institution you attended is not recognized as an institution that is qualified under this category.	3	0	1	4
<b>R186(w) (Institute qualified) Total</b>	<b>N/A</b>	<b>3</b>	<b>0</b>	<b>1</b>	<b>4</b>
<b>R186(w) (no full-time studies)</b>	You have not engaged in full-time studies for at least eight months at a qualified institution.	1	0	0	1
<b>R186(w) (no full-time studies) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R188(1)</b>	You are not authorized to study in Canada without a study permit, given that the program of study will not be completed within the period of stay authorized upon entry into Canada, and the duration of the program is more than six months. Your application to obtain a study permit to further pursue a program of study must be made outside Canada.	5	1	0	6
<b>R188(1) Total</b>	<b>N/A</b>	<b>5</b>	<b>1</b>	<b>0</b>	<b>6</b>
<b>R200(1)</b>	current employment situation	2	0	0	2
<b>R200(1)</b>	immigration status in country of residence	1	0	0	1
<b>R200(1)</b>	length of proposed stay in Canada	2	0	0	2
<b>R200(1)</b>	personal assets and financial status	2	0	0	2
<b>R200(1)</b>	Purpose of visit	2	0	0	2
<b>R200(1)</b>	The employer has failed to provide an offer of employment to you, as required under subparagraph 200(1)(c)(ii.1) of the IRPR.	4	0	0	4
<b>R200(1)</b>	travel history	1	0	0	1
<b>R200(1)</b>	Your current employment situation	2	0	0	2
<b>R200(1)</b>	your immigration status	1	0	0	1
<b>R200(1)</b>	Your personal assets and financial status	2	0	0	2

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(1)</b>	Your travel history	1	0	0	1
<b>R200(1) Total</b>	<b>N/A</b>	<b>20</b>	<b>0</b>	<b>0</b>	<b>20</b>
<b>R200(1)(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your personal assets and financial status.	896	116	333	1,345
<b>R200(1)(b) Assets Total</b>	<b>N/A</b>	<b>896</b>	<b>116</b>	<b>333</b>	<b>1,345</b>
<b>R200(1)(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the limited employment prospects in your country of residence.	158	51	45	254
<b>R200(1)(b) CoR Employment Total</b>	<b>N/A</b>	<b>158</b>	<b>51</b>	<b>45</b>	<b>254</b>
<b>R200(1)(b) Current Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your current employment situation.	124	140	38	302
<b>R200(1)(b) Current Employment Total</b>	<b>N/A</b>	<b>124</b>	<b>140</b>	<b>38</b>	<b>302</b>
<b>R200(1)(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your family ties in Canada and in your country of residence.	528	202	149	879

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(1)(b) Family Ties Total</b>	<b>N/A</b>	<b>528</b>	<b>202</b>	<b>149</b>	<b>879</b>
<b>R200(1)(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your immigration status.	67	28	14	109
<b>R200(1)(b) Immigration Status Total</b>	<b>N/A</b>	<b>67</b>	<b>28</b>	<b>14</b>	<b>109</b>
<b>R200(1)(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the length of your proposed stay in Canada.	492	28	13	533
<b>R200(1)(b) Length of Stay Total</b>	<b>N/A</b>	<b>492</b>	<b>28</b>	<b>13</b>	<b>533</b>
<b>R200(1)(b) Previous Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	10	1	6	17
<b>R200(1)(b) Previous Stay Total</b>	<b>N/A</b>	<b>10</b>	<b>1</b>	<b>6</b>	<b>17</b>
<b>R200(1)(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the purpose of your visit.	1,538	372	284	2,194

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(1)(b) Purpose Total</b>	<b>N/A</b>	<b>1,538</b>	<b>372</b>	<b>284</b>	<b>2,194</b>
<b>R200(1)(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your travel history.	676	180	39	895
<b>R200(1)(b) Travel History Total</b>	<b>N/A</b>	<b>676</b>	<b>180</b>	<b>39</b>	<b>895</b>
<b>R200(3)(a)</b>	You were not able to demonstrate that you will be able to adequately perform the work you seek.	9	4	1	14
<b>R200(3)(a) Total</b>	<b>N/A</b>	<b>9</b>	<b>4</b>	<b>1</b>	<b>14</b>
<b>R200(3)(b)</b>	You have not submitted a Quebec Acceptance Certificate (CAQ).	36	31	45	112
<b>R200(3)(b) Total</b>	<b>N/A</b>	<b>36</b>	<b>31</b>	<b>45</b>	<b>112</b>
<b>R200(5)</b>	I am not satisfied that the employer has demonstrated compliance with federal or provincial laws regarding employment or recruitment in the province where you will be working.	1	0	1	2
<b>R200(5) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>R200(5)/200(1)c)(ii.i)(A)</b>	I am not satisfied that the offer of employment is genuine.	4	0	4	8

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(5)/200 (1)c(ii.i)(A) Total</b>	<b>N/A</b>	<b>4</b>	<b>0</b>	<b>4</b>	<b>8</b>
<b>R203(1) (LMIA not provided)</b>	You did not provide a valid Labour Market Impact Assessment (LMIA) from the Department of Employment and Social Development Canada (ESDC).	1	1	3	5
<b>R203(1) (LMIA not provided) Total</b>	<b>N/A</b>	<b>1</b>	<b>1</b>	<b>3</b>	<b>5</b>
<b>R203(1)(a)</b>	You have not provided evidence that you have an employment offer that includes a job title, a wage, the length of employment and the required education and skills.	1	0	0	1
<b>R203(1)(a) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R203(1)(d) (ii)</b>	I am not satisfied that your employer will be able to provide you with private and furnished accommodation in the household, based on the documents submitted, their household configuration, the number of members in the household and number of available bedrooms in the house.	1	0	0	1
<b>R203(1)(d) (ii) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R205(a) or R205(c)(ii) NOC</b>	Eligibility for a work permit in this category only applies to the spouse or common-law partner of a work permit holder who is doing work that is at a level that falls within National Occupational Classification (NOC) skill levels 0, A or B.	4	3	6	13
<b>R205(a) or R205(c)(ii) NOC Total</b>	<b>N/A</b>	<b>4</b>	<b>3</b>	<b>6</b>	<b>13</b>
<b>R205(c)(i) (Open WP)</b>	Spouses and common-law partners of full-time students in a program at some institutions in Canada can apply for a generic (open) work permit. However, the institution your spouse or common-law partner is attending is not an institution that is qualified under this category.	1	0	3	4
<b>R205(c)(i) (Open WP) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>3</b>	<b>4</b>
<b>R205(c)(i) (Work essential)</b>	You have not shown that the work you wish to undertake is an essential element to complete your studies.	2	0	0	2
<b>R205(c)(i) (Work essential) Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>R206(1)</b>	You are able to support yourself without public assistance and, therefore, do not meet the requirements.	2	0	1	3

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R206(1) Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>1</b>	<b>3</b>
<b>R207(d)</b>	Your application for permanent residence has been refused; therefore, you are no longer eligible for an open work permit.	0	0	1	1
<b>R207(d) Total</b>	<b>N/A</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>
<b>R216(1)</b>	any history of contravening the conditions of admission on a previous stay in Canada	5	0	0	5
<b>R216(1)</b>	current employment situation	534	2	2	538
<b>R216(1)</b>	employment prospects in country of residence	506	4	3	513
<b>R216(1)</b>	family ties in Canada and in country of residence	314	1	1	316
<b>R216(1)</b>	immigration status in country of residence	135	1	1	137
<b>R216(1)</b>	length of proposed stay in Canada	388	3		391
<b>R216(1)</b>	Limited employment prospects in your country of residence	506	4	3	513
<b>R216(1)</b>	personal assets and financial status	1,142	7	3	1,152
<b>R216(1)</b>	Purpose of visit	3,671	8	5	3,684
<b>R216(1)</b>	travel history	421	1	1	423
<b>R216(1)</b>	Your current employment situation	534	2	2	538
<b>R216(1)</b>	Your family ties in Canada and in your country of residence	314	1	1	316

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)</b>	your history of having contravened the conditions of admission on a previous stay in Canada	5	0	0	5
<b>R216(1)</b>	your immigration status	135	1	1	137
<b>R216(1)</b>	Your personal assets and financial status	1,142	7	3	1,152
<b>R216(1)</b>	Your travel history	421	1	1	423
<b>R216(1) Total</b>	<b>N/A</b>	<b>10,173</b>	<b>43</b>	<b>27</b>	<b>10,243</b>
<b>R216(1) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, based on the length of your proposed stay in Canada.	136	34	42	212
<b>R216(1) Length of Stay Total</b>	<b>N/A</b>	<b>136</b>	<b>34</b>	<b>42</b>	<b>212</b>
<b>R216(1)(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your personal assets and financial status.	44,341	29,092	55,818	129,251
<b>R216(1)(b) Assets Total</b>	<b>N/A</b>	<b>44,341</b>	<b>29,092</b>	<b>55,818</b>	<b>129,251</b>
<b>R216(1)(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the limited employment prospects in your country of residence.	15,906	16,411	32,498	64,815

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)(b) CoR Employment Total</b>	<b>N/A</b>	<b>15,906</b>	<b>16,411</b>	<b>32,498</b>	<b>64,815</b>
<b>R216(1)(b) Current Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your current employment situation.	16,104	10,354	20,054	46,512
<b>R216(1)(b) Current Employment Total</b>	<b>N/A</b>	<b>16,104</b>	<b>10,354</b>	<b>20,054</b>	<b>46,512</b>
<b>R216(1)(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your family ties in Canada and in your country of residence.	26,781	25,001	42,677	94,459
<b>R216(1)(b) Family Ties Total</b>	<b>N/A</b>	<b>26,781</b>	<b>25,001</b>	<b>42,677</b>	<b>94,459</b>
<b>R216(1)(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your immigration status.	2,989	2,359	6,106	11,454
<b>R216(1)(b) Immigration Status Total</b>	<b>N/A</b>	<b>2,989</b>	<b>2,359</b>	<b>6,106</b>	<b>11,454</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the length of your proposed stay in Canada.	1,839	892	577	3,308
<b>R216(1)(b) Length of Stay Total</b>	<b>N/A</b>	<b>1,839</b>	<b>892</b>	<b>577</b>	<b>3,308</b>
<b>R216(1)(b) Previous Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	482	284	295	1,061
<b>R216(1)(b) Previous Stay Total</b>	<b>N/A</b>	<b>482</b>	<b>284</b>	<b>295</b>	<b>1,061</b>
<b>R216(1)(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the purpose of your visit.	119,682	86,685	175,370	381,737
<b>R216(1)(b) Purpose Total</b>	<b>N/A</b>	<b>119,682</b>	<b>86,685</b>	<b>175,370</b>	<b>381,737</b>
<b>R216(1)(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your travel history.	15,892	11,296	16,715	43,903
<b>R216(1)(b) Travel History Total</b>	<b>N/A</b>	<b>15,892</b>	<b>11,296</b>	<b>16,715</b>	<b>43,903</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(3)</b>	You have not submitted a Certificat d'acceptation du Québec (CAQ).	9	0	0	9
<b>R216(3)</b>	You have not submitted a Quebec Acceptance Certificate (CAQ).	514	149	575	1,238
<b>R216(3) Total</b>	<b>N/A</b>	<b>523</b>	<b>149</b>	<b>575</b>	<b>1,247</b>
<b>R219(1)</b>	You have submitted written documentation from the educational institution at which you intend to study that states that you have been accepted to study there.	20	0	0	20
<b>R219(1)</b>	You have not submitted written documentation from the educational institution where you intend to study that states that you have been accepted to study there.	678	250	619	1,547
<b>R219(1) Total</b>	<b>N/A</b>	<b>698</b>	<b>250</b>	<b>619</b>	<b>1,567</b>
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to maintain yourself and any family members who are accompanying you during your proposed period of study	231	4	1	236
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the costs of transporting yourself and any family members who are accompanying you to and from Canada.	121	1	0	122

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the tuition fees for the course or program of studies that you intend to pursue	753	7	1	761
<b>R220 Total</b>	<b>N/A</b>	<b>1,105</b>	<b>12</b>	<b>2</b>	<b>1,119</b>
<b>R220(a)</b>	Pursuant to paragraph 220(a) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the tuition fees for the course or program of studies that you intend to pursue.	24,058	9,131	16,006	49,195
<b>R220(a) Total</b>	<b>N/A</b>	<b>24,058</b>	<b>9,131</b>	<b>16,006</b>	<b>49,195</b>
<b>R220(b)</b>	Pursuant to paragraph 220(b) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to maintain yourself and any family members who are accompanying you during your proposed period of study.	12,684	4,787	10,896	28,367
<b>R220(b) Total</b>	<b>N/A</b>	<b>12,684</b>	<b>4,787</b>	<b>10,896</b>	<b>28,367</b>
<b>R220(c)</b>	Pursuant to paragraph 220(c) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the cost of transporting yourself and any family members who are accompanying you to and from Canada.	5,239	1,709	3,183	10,131

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R220(c) Total</b>	<b>N/A</b>	<b>5,239</b>	<b>1,709</b>	<b>3,183</b>	<b>10,131</b>
<b>R303.1</b>	The employer has failed to pay the employer compliance fee, as required under section 303.1 of the IRPR.	1	0	0	1
<b>R303.1 Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R52(1)</b>	You have not produced evidence that you are in possession of a passport and that it is valid for the duration of your stay in Canada.	75	15	25	115
<b>R52(1) Total</b>	<b>N/A</b>	<b>75</b>	<b>15</b>	<b>25</b>	<b>115</b>
<b>R7.01(2)</b>	You do not meet the eligibility requirements necessary to make an application for an electronic travel authorization as per 7.01(2) of the Immigration and Refugee Protection Regulations, as our records indicate that you did not hold a Canadian temporary resident visa at any time during the 10 year period immediately preceding the day on which you made your application, or you did not hold a valid United States non-immigrant visa on the day in which you made your application.	109	27	45	181
<b>R7.01(2) Total</b>	<b>N/A</b>	<b>109</b>	<b>27</b>	<b>45</b>	<b>181</b>
<b>Unspecified</b>	Other reasons**:	4,001	5	0	4,006
<b>Unspecified Total</b>	<b>N/A</b>	<b>4,001</b>	<b>5</b>	<b>0</b>	<b>4,006</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>Grand Total</b>	<b>N/A</b>	<b>400,594</b>	<b>255,964</b>	<b>495,058</b>	<b>1,151,616</b>

Source: Immigration, Refugees and Citizenship Canada, *CIMM 7.7 Reasons for refusal statistics*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 4 April 2022.

Note: \* Please note that more than one refusal ground may apply to a single application.

\*\* Refusals can have multiple grounds. "Other reasons" is generally used when an officer wants to provide an explanation or further details in the refusal letter.

**Table 2—Reasons for refusal for Study Permit Applications Processed for African\*\*, French-speaking Applicants\*\*\* between January 1, 2019-December 31, 2021 (in instances)\***

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1)</b>	From the documents which you have submitted in support of your application, I am not satisfied that you have answered all questions truthfully, as required by subsection 16(1) of the Act. Specifically, I am not satisfied that the following information is truthful:	12	0	0	12
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: Biometrics	1	0	0	1
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: Completion of a medical examination	1	0	0	1
<b>A16(1)</b>	You have not complied with our request for information, as per section 16(1) of the <i>Immigration and Refugee Protection Act</i> . To date, you have failed to comply with our request for: The following documents:	1	0	0	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1)</b>	You have submitted documentation which lacks authenticity as part of your application. This has diminished the overall credibility of your submission.	19	0	0	19
<b>A16(1) Total</b>	<b>N/A</b>	<b>34</b>	<b>0</b>	<b>0</b>	<b>34</b>
<b>A16(1) Authenticity</b>	You have submitted documentation that lacks authenticity as part of your application. This has diminished the overall credibility of your submission.	140	87	299	526
<b>A16(1) Authenticity Total</b>	<b>N/A</b>	<b>140</b>	<b>87</b>	<b>299</b>	<b>526</b>
<b>A16(1) Biometrics</b>	You have not complied with our request for information, per subsection 16(1) of the IRPA. To date, you have failed to comply with our request for biometrics.	131	22	279	432
<b>A16(1) Biometrics Total</b>	<b>N/A</b>	<b>131</b>	<b>22</b>	<b>279</b>	<b>432</b>
<b>A16(1) Documents</b>	You have not complied with our request for information, per subsection 16(1) of the IRPA. To date, you have failed to comply with our request for submission of the following documents:	151	73	1,211	1,435
<b>A16(1) Documents Total</b>	<b>N/A</b>	<b>151</b>	<b>73</b>	<b>1,211</b>	<b>1,435</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1) Host Income</b>	You have not provided sufficient documentation to support your or your host's income and assets.	128	6	45	179
<b>A16(1) Host Income Total</b>	<b>N/A</b>	<b>128</b>	<b>6</b>	<b>45</b>	<b>179</b>
<b>A16(1) Suf. Fund</b>	I am not satisfied that you have sufficient funds, including income or assets, to carry out your stated purpose in coming to Canada or to maintain yourself while in Canada and to effect your departure.	2,555	1,391	436	4,382
<b>A16(1) Suf. Fund Total</b>	<b>N/A</b>	<b>2,555</b>	<b>1,391</b>	<b>436</b>	<b>4,382</b>
<b>A16(1) Truthful</b>	I am not satisfied that you have truthfully answered all questions in the documents you have submitted in support of your application, as required by subsection 16(1) of the IRPA. Specifically, I am not satisfied that the following information is truthful:	190	246	118	554
<b>A16(1) Truthful Total</b>	<b>N/A</b>	<b>190</b>	<b>246</b>	<b>118</b>	<b>554</b>
<b>A16(1)(a)</b>	I am not satisfied that you have truthfully answered all questions asked of you.	345	138	98	581
<b>A16(1)(a) Total</b>	<b>N/A</b>	<b>345</b>	<b>138</b>	<b>98</b>	<b>581</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A16(1.1) Examination</b>	You have not complied with our request for information, per subsection 16(1.1) of the IRPA. To date, you have failed to comply with our request for an examination.	51	10	98	159
<b>A16(1.1) Examination Total</b>	<b>N/A</b>	<b>51</b>	<b>10</b>	<b>98</b>	<b>159</b>
<b>A16(2)</b>	You have not complied with our request for information, per subsection 16(2) of the IRPA. To date, you have failed to comply with our request for completion of a medical examination.	2	0	0	2
<b>A16(2) Total</b>	<b>N/A</b>	<b>2</b>	<b>0</b>	<b>0</b>	<b>2</b>
<b>A16(2) Medical Exam</b>	You have not complied with our request for information, per subsection 16(2) of the IRPA. To date, you have failed to comply with our request for completion of a medical examination.	41	45	89	175
<b>A16(2) Medical Exam Total</b>	<b>N/A</b>	<b>41</b>	<b>45</b>	<b>89</b>	<b>175</b>
<b>A36(1)(b)</b>	You are found inadmissible to Canada under paragraph 36(1)(b) of the IRPA: having been convicted of an offence outside Canada that, if committed in Canada, would constitute an offence under an Act of Parliament punishable by a maximum term of imprisonment of at least 10 years.	1	0	0	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A36(1)(b) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>A38(1)(a)</b>	You are found inadmissible to Canada under paragraph 38(1)(a) of the IRPA: likely to be a danger to public health.	1	0	0	1
<b>A38(1)(a) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>A38(1)(c)</b>	You are found inadmissible to Canada under paragraph 38(1)(c) of the IRPA: might reasonably be expected to cause excessive demand on health or social services.	1	0	0	1
<b>A38(1)(c) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>A39</b>	You are found inadmissible to Canada under section 39 of the IRPA: you are or will be unable or unwilling to support yourself or any other person who is dependent on you, and have not satisfied an officer that adequate arrangements for care and support, other than those that involve social assistance, have been made.	0	0	2	2
<b>A39 Total</b>	<b>N/A</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>
<b>A40(1)(a)</b>	A40(1)(a): For directly or indirectly misrepresenting or withholding material facts relating to a relevant matter that induces or could induce an error in the administration of this Act;	1	0	0	1

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A40(1)(a)</b>	You have been found inadmissible to Canada in accordance with paragraph 40(1)(a) of the <i>Immigration and Refugee Protection Act</i> (IRPA) for directly or indirectly misrepresenting or withholding material facts relating to a relevant matter that induces or could induce an error in the administration of the IRPA. In accordance with paragraph A40(2)(a), you will remain inadmissible to Canada for a period of five years from the date of this letter or from the date a previous removal order was enforced.	1,266	518	1,067	2,851
<b>A40(1)(a) Total</b>	<b>N/A</b>	<b>1,267</b>	<b>518</b>	<b>1,067</b>	<b>2,852</b>
<b>A40(2)(a)</b>	At a prior refusal, you were found inadmissible to Canada for misrepresentation. In accordance with paragraph 40(2)(a) of the <i>Immigration and Refugee Protection Act</i> (IRPA), you remain inadmissible for a period of five years from the date of your prior refusal or from the date a previous removal order was enforced.	63	66	88	217
<b>A40(2)(a) Total</b>	<b>N/A</b>	<b>63</b>	<b>66</b>	<b>88</b>	<b>217</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>A41(a)</b>	You are found inadmissible to Canada under paragraph 41(a) of the IRPA: through an act or omission which contravenes, directly or indirectly, a provision of this Act.	11	2	4	17
<b>A41(a) Total</b>	<b>N/A</b>	<b>11</b>	<b>2</b>	<b>4</b>	<b>17</b>
<b>A42(1)(a)</b>	You are found inadmissible to Canada under paragraph 42(1)(a) of the IRPA: your family member is inadmissible.	1	0	0	1
<b>A42(1)(a) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>Other</b>	Unspecified	6,538	6,844	8,886	22,268
<b>Other Total</b>	<b>N/A</b>	<b>6,538</b>	<b>6,844</b>	<b>8,886</b>	<b>22,268</b>
<b>R179</b>	current employment situation	2	0	0	2
<b>R179</b>	employment prospects in country of residence	2	0	0	2
<b>R179</b>	I am not satisfied that you have truthfully answered all questions asked of you.	23	26	19	68
<b>R179</b>	Limited employment prospects in your country of residence	2	0	0	2
<b>R179</b>	personal assets and financial status	3	0	0	3
<b>R179</b>	Purpose of visit	2	0	0	2
<b>R179</b>	travel history	1	0	0	1
<b>R179</b>	Your current employment situation	2	0	0	2
<b>R179</b>	Your personal assets and financial status	3	0	0	3

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179</b>	Your travel history	1	0	0	1
<b>R179 Total</b>	<b>N/A</b>	<b>41</b>	<b>26</b>	<b>19</b>	<b>86</b>
<b>R179(1)b)</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, based on the length of your proposed stay in Canada.	21	3	0	24
<b>R179(1)b) Total</b>	<b>N/A</b>	<b>21</b>	<b>3</b>	<b>0</b>	<b>24</b>
<b>R179(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your personal assets and financial status.	343	71	89	503
<b>R179(b) Assets Total</b>	<b>N/A</b>	<b>343</b>	<b>71</b>	<b>89</b>	<b>503</b>
<b>R179(b) Conditions</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	14	1	1	16
<b>R179(b) Conditions Total</b>	<b>N/A</b>	<b>14</b>	<b>1</b>	<b>1</b>	<b>16</b>
<b>R179(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the limited employment prospects in your country of residence.	199	57	23	279

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179(b) CoR Employment Total</b>	<b>N/A</b>	<b>199</b>	<b>57</b>	<b>23</b>	<b>279</b>
<b>R179(b) Cur. Employment</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your current employment situation.	82	15	18	115
<b>R179(b) Cur. Employment Total</b>	<b>N/A</b>	<b>82</b>	<b>15</b>	<b>18</b>	<b>115</b>
<b>R179(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your family ties in Canada and in your country of residence.	192	59	11	262
<b>R179(b) Family Ties Total</b>	<b>N/A</b>	<b>192</b>	<b>59</b>	<b>11</b>	<b>262</b>
<b>R179(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your immigration status.	83	3	2	88
<b>R179(b) Immigration Status Total</b>	<b>N/A</b>	<b>83</b>	<b>3</b>	<b>2</b>	<b>88</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R179(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the length of your proposed stay in Canada.	1,474	1,198	65	2,737
<b>R179(b) Length of Stay Total</b>	<b>N/A</b>	<b>1,474</b>	<b>1,198</b>	<b>65</b>	<b>2,737</b>
<b>R179(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on the purpose of your visit.	1,908	1,330	106	3,344
<b>R179(b) Purpose Total</b>	<b>N/A</b>	<b>1,908</b>	<b>1,330</b>	<b>106</b>	<b>3,344</b>
<b>R179(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, as stipulated in paragraph 179(b) of the IRPR, based on your travel history.	796	6	5	807
<b>R179(b) Travel History Total</b>	<b>N/A</b>	<b>796</b>	<b>6</b>	<b>5</b>	<b>807</b>
<b>R181(1)</b>	Your status as a temporary resident has expired. You did not submit an application for extension of your temporary resident status on or before the expiry of the authorized period.	1	0	0	1
<b>R181(1) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R183(1)</b>	You have worked or studied in Canada without authorization and, therefore, have violated a condition imposed under subsection 183(1) of the IRPR.	1	0	0	1
<b>R183(1) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R200(1)</b>	current employment situation	1	0	0	1
<b>R200(1)</b>	length of proposed stay in Canada	1	0	0	1
<b>R200(1)</b>	personal assets and financial status	1	0	0	1
<b>R200(1)</b>	Purpose of visit	1	0	0	1
<b>R200(1)</b>	Your current employment situation	1	0	0	1
<b>R200(1)</b>	Your personal assets and financial status	1	0	0	1
<b>R200(1) Total</b>	<b>N/A</b>	<b>6</b>	<b>0</b>	<b>0</b>	<b>6</b>
<b>R200(1)(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your personal assets and financial status.	39	9	28	76
<b>R200(1)(b) Assets Total</b>	<b>N/A</b>	<b>39</b>	<b>9</b>	<b>28</b>	<b>76</b>
<b>R200(1)(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the limited employment prospects in your country of residence.	61	8	19	88

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(1)(b) CoR Employment Total</b>	<b>N/A</b>	<b>61</b>	<b>8</b>	<b>19</b>	<b>88</b>
<b>R200(1)(b) Current Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your current employment situation.	10	6	2	18
<b>R200(1)(b) Current Employment Total</b>	<b>N/A</b>	<b>10</b>	<b>6</b>	<b>2</b>	<b>18</b>
<b>R200(1)(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your family ties in Canada and in your country of residence.	245	6	2	253
<b>R200(1)(b) Family Ties Total</b>	<b>N/A</b>	<b>245</b>	<b>6</b>	<b>2</b>	<b>253</b>
<b>R200(1)(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your immigration status.	1	0	2	3
<b>R200(1)(b) Immigration Status Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>2</b>	<b>3</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(1)(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the length of your proposed stay in Canada.	243	4	0	247
<b>R200(1)(b) Length of Stay Total</b>	<b>N/A</b>	<b>243</b>	<b>4</b>	<b>0</b>	<b>247</b>
<b>R200(1)(b) Previous Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	1	0	1	2
<b>R200(1)(b) Previous Stay Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>1</b>	<b>2</b>
<b>R200(1)(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on the purpose of your visit.	268	41	24	333
<b>R200(1)(b) Purpose Total</b>	<b>N/A</b>	<b>268</b>	<b>41</b>	<b>24</b>	<b>333</b>
<b>R200(1)(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 200(1) of the IRPR, based on your travel history.	30	24	20	74
<b>R200(1)(b) Travel History Total</b>	<b>N/A</b>	<b>30</b>	<b>24</b>	<b>20</b>	<b>74</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R200(3)(a)</b>	You were not able to demonstrate that you will be able to adequately perform the work you seek.	1	0	0	1
<b>R200(3)(a) Total</b>	<b>N/A</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>1</b>
<b>R200(3)(b)</b>	You have not submitted a Quebec Acceptance Certificate (CAQ).	3	21	4	28
<b>R200(3)(b) Total</b>	<b>N/A</b>	<b>3</b>	<b>21</b>	<b>4</b>	<b>28</b>
<b>R205(a) or R205(c)(ii) NOC</b>	Eligibility for a work permit in this category only applies to the spouse or common-law partner of a work permit holder who is doing work that is at a level that falls within National Occupational Classification (NOC) skill levels 0, A or B.	0	0	2	2
<b>R205(a) or R205(c)(ii) NOC Total</b>	<b>N/A</b>	<b>0</b>	<b>0</b>	<b>2</b>	<b>2</b>
<b>R216(1)</b>	any history of contravening the conditions of admission on a previous stay in Canada	1	0	0	1
<b>R216(1)</b>	current employment situation	229	0	1	230
<b>R216(1)</b>	employment prospects in country of residence	295	2	3	300
<b>R216(1)</b>	family ties in Canada and in country of residence	43	1	1	45
<b>R216(1)</b>	immigration status in country of residence	7	0	0	7
<b>R216(1)</b>	length of proposed stay in Canada	173	1	0	174

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)</b>	Limited employment prospects in your country of residence	295	2	3	300
<b>R216(1)</b>	personal assets and financial status	655	3	2	660
<b>R216(1)</b>	Purpose of visit	853	3	4	860
<b>R216(1)</b>	travel history	163	0	1	164
<b>R216(1)</b>	Your current employment situation	229	0	1	230
<b>R216(1)</b>	your family ties in Canada and in your country of residence	43	1	1	45
<b>R216(1)</b>	your history of having contravened the conditions of admission on a previous stay in Canada	1	0	0	1
<b>R216(1)</b>	your immigration status	7	0	0	7
<b>R216(1)</b>	Your personal assets and financial status	655	3	2	660
<b>R216(1)</b>	Your travel history	163	0	1	164
<b>R216(1) Total</b>	<b>N/A</b>	<b>3,812</b>	<b>16</b>	<b>20</b>	<b>3,848</b>
<b>R216(1) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay as a temporary resident, based on the length of your proposed stay in Canada.	14	2	3	19
<b>R216(1) Length of Stay Total</b>	<b>N/A</b>	<b>14</b>	<b>2</b>	<b>3</b>	<b>19</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)(b) Assets</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your personal assets and financial status.	11,136	9,095	15,333	35,564
<b>R216(1)(b) Assets Total</b>	<b>N/A</b>	<b>11,136</b>	<b>9,095</b>	<b>15,333</b>	<b>35,564</b>
<b>R216(1)(b) CoR Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the limited employment prospects in your country of residence.	6,808	9,517	16,292	32,617
<b>R216(1)(b) CoR Employment Total</b>	<b>N/A</b>	<b>6,808</b>	<b>9,517</b>	<b>16,292</b>	<b>32,617</b>
<b>R216(1)(b) Current Employment</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your current employment situation.	3,395	3,857	6,519	13,771
<b>R216(1)(b) Current Employment Total</b>	<b>N/A</b>	<b>3,395</b>	<b>3,857</b>	<b>6,519</b>	<b>13,771</b>
<b>R216(1)(b) Family Ties</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your family ties in Canada and in your country of residence.	4,688	6,557	8,377	19,622

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)(b) Family Ties Total</b>	<b>N/A</b>	<b>4,688</b>	<b>6,557</b>	<b>8,377</b>	<b>19,622</b>
<b>R216(1)(b) Immigration Status</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your immigration status.	270	170	407	847
<b>R216(1)(b) Immigration Status Total</b>	<b>N/A</b>	<b>270</b>	<b>170</b>	<b>407</b>	<b>847</b>
<b>R216(1)(b) Length of Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the length of your proposed stay in Canada.	317	445	108	870
<b>R216(1)(b) Length of Stay Total</b>	<b>N/A</b>	<b>317</b>	<b>445</b>	<b>108</b>	<b>870</b>
<b>R216(1)(b) Previous Stay</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your history of having contravened the conditions of admission on a previous stay in Canada.	70	23	27	120
<b>R216(1)(b) Previous Stay Total</b>	<b>N/A</b>	<b>70</b>	<b>23</b>	<b>27</b>	<b>120</b>
<b>R216(1)(b) Purpose</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on the purpose of your visit.	17,501	17,987	25,991	61,479

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R216(1)(b) Purpose Total</b>	<b>N/A</b>	<b>17,501</b>	<b>17,987</b>	<b>25,991</b>	<b>61,479</b>
<b>R216(1)(b) Travel History</b>	I am not satisfied that you will leave Canada at the end of your stay, as stipulated in subsection 216(1) of the IRPR, based on your travel history.	4,002	5,988	9,241	19,231
<b>R216(1)(b) Travel History Total</b>	<b>N/A</b>	<b>4,002</b>	<b>5,988</b>	<b>9,241</b>	<b>19,231</b>
<b>R216(3)</b>	You have not submitted a Certificat d'acceptation du Québec (CAQ).	1	0	0	1
<b>R216(3)</b>	You have not submitted a Quebec Acceptance Certificate (CAQ).	198	99	288	585
<b>R216(3) Total</b>	<b>N/A</b>	<b>199</b>	<b>99</b>	<b>288</b>	<b>586</b>
<b>R219(1)</b>	have submitted written documentation from the educational institution at which you intend to study that states that you have been accepted to study there.	1	0	0	1
<b>R219(1)</b>	You have not submitted written documentation from the educational institution where you intend to study that states that you have been accepted to study there.	19	46	57	122
<b>R219(1) Total</b>	<b>N/A</b>	<b>20</b>	<b>46</b>	<b>57</b>	<b>123</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to maintain yourself and any family members who are accompanying you during your proposed period of study	30	3	1	34
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the costs of transporting yourself and any family members who are accompanying you to and from Canada.	28	1	0	29
<b>R220</b>	I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the tuition fees for the course or program of studies that you intend to pursue	487	6	0	493
<b>R220 Total</b>	<b>N/A</b>	<b>545</b>	<b>10</b>	<b>1</b>	<b>556</b>
<b>R220(a)</b>	Pursuant to paragraph 220(a) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the tuition fees for the course or program of studies that you intend to pursue.	9,067	2,823	3,887	15,777
<b>R220(a) Total</b>	<b>N/A</b>	<b>9,067</b>	<b>2,823</b>	<b>3,887</b>	<b>15,777</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R220(b)</b>	Pursuant to paragraph 220(b) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to maintain yourself and any family members who are accompanying you during your proposed period of study.	984	351	1,133	2,468
<b>R220(b) Total</b>	<b>N/A</b>	<b>984</b>	<b>351</b>	<b>1,133</b>	<b>2,468</b>
<b>R220(c)</b>	Pursuant to paragraph 220(c) of the IRPA, I am not satisfied that you have sufficient and available financial resources, without working in Canada, to pay the cost of transporting yourself and any family members who are accompanying you to and from Canada.	173	149	919	1,241
<b>R220(c) Total</b>	<b>N/A</b>	<b>173</b>	<b>149</b>	<b>919</b>	<b>1,241</b>
<b>R52(1)</b>	You have not produced evidence that you are in possession of a passport and that it is valid for the duration of your stay in Canada.	0	0	1	1
<b>R52(1) Total</b>	<b>N/A</b>	<b>0</b>	<b>0</b>	<b>1</b>	<b>1</b>

TR Refusal Ground	TR Refusal Ground Description	2019	2020	2021	Grand Total
<b>R7.01(2)</b>	You do not meet the eligibility requirements necessary to make an application for an electronic travel authorization as per 7.01(2) of the Immigration and Refugee Protection Regulations, as our records indicate that you did not hold a Canadian temporary resident visa at any time during the 10 year period immediately preceding the day on which you made your application, or you did not hold a valid United States non-immigrant visa on the day in which you made your application.	23	1	1	25
<b>R7.01(2) Total</b>	<b>N/A</b>	<b>23</b>	<b>1</b>	<b>1</b>	<b>25</b>
<b>Unspecified</b>	Other reasons****:	550	4	0	554
<b>Unspecified Total</b>	<b>N/A</b>	<b>550</b>	<b>4</b>	<b>0</b>	<b>554</b>
<b>Grand Total</b>	<b>N/A</b>	<b>81,288</b>	<b>69,476</b>	<b>101,768</b>	<b>252,532</b>

Source: Immigration, Refugees and Citizenship Canada, *CIMM 7.7 Reasons for refusal statistics*, response to a request for information made by the Standing Committee on Citizenship and Immigration on February 17, 2022, 4 April 2022.

Note: \* Please note that more than one refusal ground may apply to a single application.

\*\* Includes only clients residing in Africa

\*\*\* Includes only clients with French Official Languages

\*\*\*\* Refusals can have multiple grounds. "Other reasons" is generally used when an officer wants to provide an explanation or further details in the refusal letter.

## APPENDIX B LIST OF WITNESSES

The following table lists the witnesses who appeared before the committee at its meetings related to this report. Transcripts of all public meetings related to this report are available on the committee’s [webpage for this study](#).

Organizations and Individuals	Date	Meeting
<b>Canadian Bureau for International Education</b> Larissa Bezo, President and Chief Executive Officer	2022/02/01	2
<b>Fédération des cégeps</b> Francis Brown Mastropaolo, Director International Affairs	2022/02/01	2
<b>Universities Canada</b> Paul Davidson, President and Chief Executive Officer Marc LeBlanc, Senior Government and International Relations Officer	2022/02/01	2
<b>As an individual</b> Lou Janssen Dangzalan, Immigration Lawyer Wei William Tao, Canadian Immigration Lawyer and Co-founder of the Arenous Foundation	2022/02/03	3
<b>Association des collèges et universités de la francophonie canadienne</b> Martin Normand, Director Strategic Research and International Relations	2022/02/03	3
<b>Canadian Alliance of Student Associations</b> Christian Fotang, Chair of the Board of Directors Jared Maltais, Interim Executive Director	2022/02/03	3
<b>Fédération des communautés francophones et acadienne du Canada</b> Alain Dupuis, Director General	2022/02/03	3
<b>Le Québec c’est nous aussi</b> Thibault Camara, President	2022/02/03	3

<b>Organizations and Individuals</b>	<b>Date</b>	<b>Meeting</b>
<b>African Scholars Initiative</b> Gideon Christian, President	2022/02/08	4
<b>ApplyBoard</b> Martin Basiri, Chief Executive Officer and Co-founder	2022/02/08	4
<b>Canadian Chamber of Commerce</b> Leah Nord, Senior Director Workforce Strategies and Inclusive Growth	2022/02/08	4
<b>Colleges and Institutes Canada</b> Denise Amyot, President and Chief Executive Officer Andrew Champagne, Manager Mobility Programs	2022/02/08	4
<b>High Commission for the People's Republic of Bangladesh</b> H.E. Khalilur Rahman, High Commissioner of the People's Republic of Bangladesh	2022/02/08	4
<b>Hearst University</b> Luc Bussi�eres, Rector	2022/02/10	5
<b>Kwantlen Polytechnic University</b> Carole St. Laurent, Associate Vice-President International	2022/02/10	5
<b>Universit� de l'Ontario fran�ais</b> Paulin Mulatris, Professor	2022/02/10	5
<b>Universit� Laval</b> Yan Cimon, Deputy Vice Rector of External and International Affairs and Health, Director of International Affairs and La Francophonie	2022/02/10	5
<b>University of Ottawa</b> Alain-S�bastien Malette, Associate Vice-President, International	2022/02/10	5
<b>University of Saskatchewan</b> Pirita Mattola, Manager International Student and Study Abroad Centre	2022/02/10	5

<b>Organizations and Individuals</b>	<b>Date</b>	<b>Meeting</b>
<b>Department of Citizenship and Immigration</b> Marian Campbell Jarvis, Senior Assistant Deputy Minister Strategic and Program Policy Hon. Sean Fraser, P.C., M.P., Minister of Immigration, Refugees and Citizenship Pemi Gill, Director General International Network Daniel Mills, Senior Assistant Deputy Minister Operations Corinne Prince, Acting Assistant Deputy Minister Settlement and Integration	2022/02/17	7
<b>Réseau des cégeps et des collèges francophones du  Canada</b> François Dornier, Chairman of the Board Jean Léger, Executive Director	2022/03/01	8
<b>World Education Services</b> Shamira Madhany, Managing Director, Canada and Deputy Executive Director	2022/03/01	8



## APPENDIX C LIST OF BRIEFS

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The following is an alphabetical list of organizations and individuals who submitted briefs to the committee related to this report. For more information, please consult the committee's [webpage for this study](#).

**African Scholars Initiative**

**Association des collèges et universités de la francophonie canadienne**

**Bellissimo Law Group Professional Corporation**

**Blaney, Earl**

**Canadian Association of University Teachers**

**EduNova Co-operative Ltd.**

**Fédération des cégeps**

**Fédération des communautés francophones et acadienne du Canada**

**Hurley, Peter**

**Janssen Dangzalan, Lou**

**Le Québec c'est nous aussi**

**Memorial University of Newfoundland**

**Ontario Council of Agencies Serving Immigrants**

**Saint Mary's University**

**Tao, Wei William**

**Undergraduates of Canadian Research-Intensive Universities**

**Université Laval**

**Universities Canada**

**University of Regina**

**Virtue Educational and Allied Services**

**World Education Services**



## REQUEST FOR GOVERNMENT RESPONSE

Pursuant to Standing Order 109, the committee requests that the government table a comprehensive response to this Report.

A copy of the relevant *Minutes of Proceedings* ([Meetings Nos. 2, 3, 4, 5, 7, 8, 10, 14, 15, 20, 22, 24](#)) is tabled.

Respectfully submitted,

Salma Zahid  
Chair

