



Canadian Bureau for  
International Education

# Consultation Brief on An Immigration System for Canada's Future

---


Submitted by: Canadian Bureau for International Education (CBIE)

Submitted to: Immigration, Refugees and Citizenship Canada (IRCC)

April 2023

## Context


The Canadian Bureau for International Education (CBIE) is grateful for the opportunity to contribute to Immigration, Refugee and Citizenship Canada's (IRCC) important and timely dialogue with Canadians on designing *An Immigration System for Canada's Future*.



### About CBIE

The Canadian Bureau for International Education is a national, non-profit association dedicated to supporting Canadian education institutions in achieving their internationalization goals through advocacy, capacity building and partnerships.

<b>50+</b> years of experience	<b>135+</b> member institutions	<b>40,000</b> scholars mobilized	<b>\$2.5</b> billion in value programmed
--------------------------------------	---------------------------------------	--	---



This dialogue matters because it helps to inform Canadians about the demographic and economic imperatives reflected in the ambitious immigration targets Canada has set going forward. Indeed, even among high-immigration countries, the level of public support in Canada for increased immigration levels is unique. But against the current backdrop of economic uncertainty and geopolitical instability, CBIE is acutely aware that this support must not be taken for granted.

To preserve this consensus, Canadians need to know three things.

**First, that there is a clear and deliberate strategy in place to leverage the 'for-Canada' benefits of immigration.**

We have the rare privilege of being able to attract the best talent to Canada at a time when we are experiencing labour shortages in key growth sectors and significant demographic challenges- especially in smaller communities and regions. Canada needs a balanced approach to immigration that harnesses the energy, skills, networks, ingenuity and creativity of international students to Canada. An approach that sets them up for success while enabling them from Day 1 to contribute to our prosperity and quality of life. That supports those who choose to remain after graduation to realise their potential and enrich our

communities, and those who choose to return home to stay connected with Canada and become advocates for what we can offer the world. International students to Canada are part of the solution. We must exercise our options wisely.

**Second, that all levels of government are working together and with community partners and stakeholders to ensure proper supports are in place to accommodate the influx of immigrants.**

Smart and properly calibrated immigration policies can expand and improve access to affordable housing, health, education, and social services for all Canadians-including for those studying in Canada. We need to be deliberate and proactive and ensure we get things right for everyone's benefit.

**And third, that our immigration policies reflect core Canadian values- of inclusion, tolerance, fairness, generosity, and international solidarity.**

These are the values that have defined Canada's global brand and made us the destination of choice for migrants from around the world. Our immigration policies, like our international education programming, must not be reduced to dollars and cents equations or viewed as a zero-sum game. We can use immigration to grow our economy, support leading-edge research and innovation in critical growth sectors, enrich our quality of life, maintain our humanitarian traditions, honour our commitments to advance United Nations Sustainable Development goals and contribute solutions to the global refugee crisis. These goals are not mutually exclusive.

## Overview

In this brief, CBIE will offer a number of observations and recommendations relating to international education and international student enrollment in Canada that are relevant to IRCC's discussion paper, *An Immigration System for Canada's Future*. These will be presented in three parts:

Part 1: Timely processing of international study permit applications

Part 2: Improving policy and program integration across the immigration ecosystem

Part 3: Streamlining pathways to permanent residency for international students

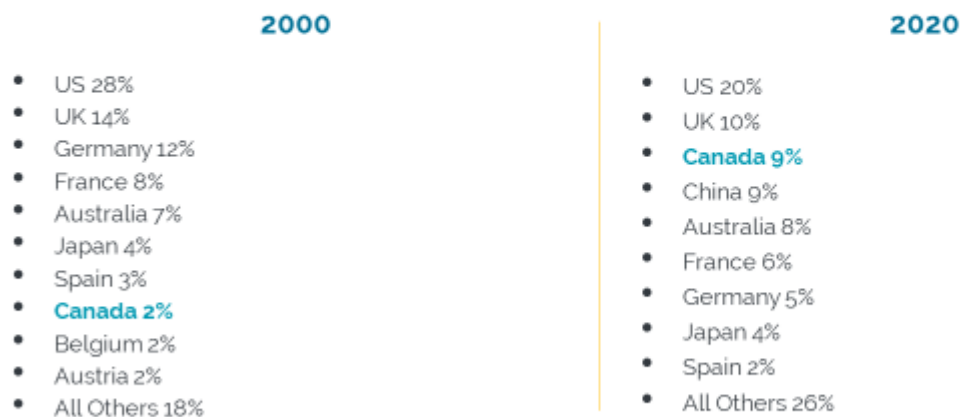
Our primary messages to IRCC and to Canadians are that:

- there are compelling reasons to acknowledge in our immigration policies, programs and planning that current and prospective international students to Canada are a strategic asset and key contributor to our current and future prosperity;
- if the immediate priority for updating Canada's immigration policies is to respond in a timely and robust way to the labour market and demographic challenges highlighted in the IRCC discussion paper, the 800,000 plus international Canadian study permit holders (60% of whom have expressed an interest in remaining in Canada after completing their studies) are a critical part of the solution- and can add value well beyond these narrow parameters; and
- accordingly, IRCC should establish a dedicated immigration stream focused on attracting the best international student talent to Canada, setting them up for success, and facilitating pathways to permanent residence for those who want to remain after completing their studies.

# Part 1: Timely Processing of International Study Permit Applications



## Top Host Destinations for International Students



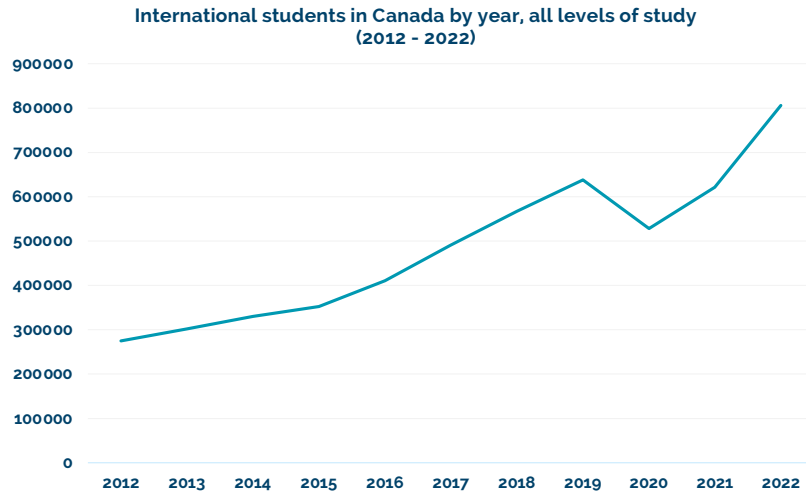
Source: Project Atlas/IIIE

Demand for international study permits to Canada has been and remains strong. Canada's longstanding attractiveness to inbound students, based on the quality of our educational institutions, consistently high rankings for quality of life and membership in both the Francophonie and Commonwealth, is only one part of the story.

More recent increases are attributable to an array of factors. These include, among others, the success of Global Affairs Canada's increasingly sophisticated 5-year International Education Strategies, Global EduCanada branding efforts that have highlighted to prospective international students the value of Canadian degrees and professional certification and more aggressive international student recruitment efforts by Canadian institutions- often with active support from all levels of government.



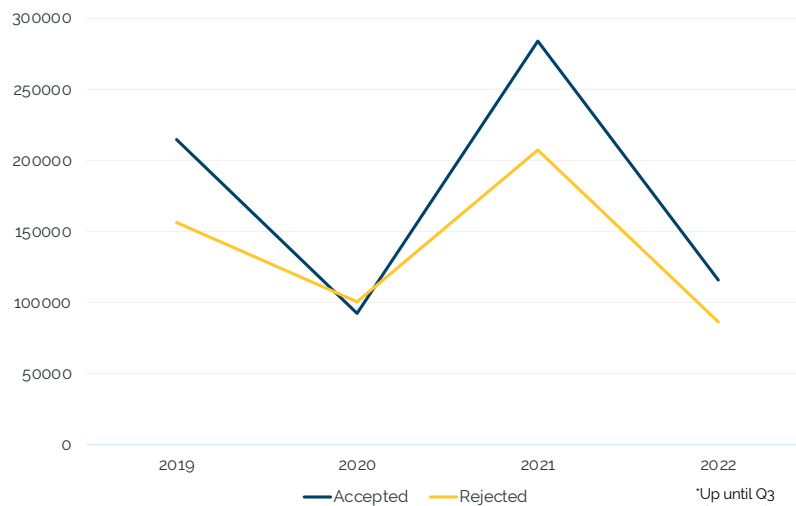
## International Students in Canada



Source: IRCC. Valid Study Permit Holders on Dec 31, 2012 - 2022



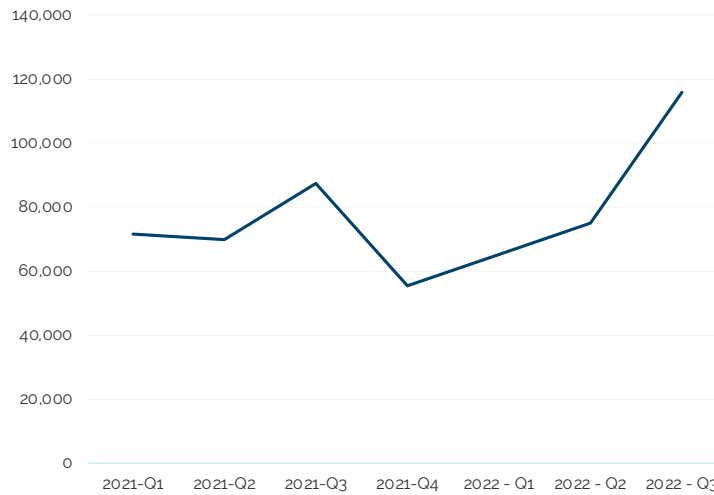
## Number of Study Permit Applications (excluding Extensions) Approved and Refused 2019 – 2022\*



Source: IRCC: Canada - [Number of Study Permit Applications \(excluding Extensions\) Approved and Refused by \(Q1 2021 – Q3 2022\)](#)



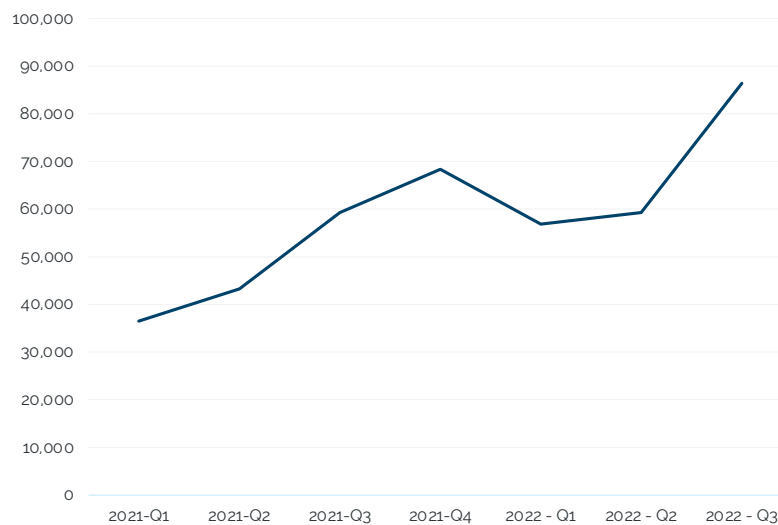
## Study Permit Application Approvals (Q1 2021 – Q3 2022)



Source: IRCC: Canada - [Number of Study Permit Applications \(excluding Extensions\) Approved and Refused by \(Q1 2021 – Q3 2022\)](#)



## Study Permit Application Rejections (2021 – Q3, 2022)



Source: IRCC: Canada - [Number of Study Permit Applications \(excluding Extensions\) Approved and Refused by \(Q1 2021 – Q3 2022\)](#)

IRCC has proven adept over time in accommodating increases in demand for international study permits. However, recent trends in regard to processing times for study permits and high rejection rates for students from “priority” countries or regions whose applications have already been accepted by Canadian institutions, are cause for concern.

To be sure, some of these delays are attributable to broader challenges resulting from the COVID-19 pandemic as well as humanitarian and other crises. But as evidenced below, there are also some systemic “disconnects” between Canada’s stated policy goals of increasing international enrollment from North and sub-Saharan Africa and our institutional readiness to deliver on those priorities.



## Rejection Rate, by Region/Country, 2019-2022

- Rejection rates for Africa are consistently the highest for any region, ranging from 65.5% in partial 2022 data to 79.3% in 2020.
- The total percentage rejected for Africa was 72.1%, compared to 44.1% for all applicants.
- The next highest region overall was Asia with an overall 40.7% rejection rate.
- Sub-Saharan Africa had the highest overall rejection rate for this time period, with 73.7% of applications rejected; it was followed by North Africa (67.1%) and Western Asia (56.6%).
- The region with the lowest rejection rate was Europe, at 15.1% (and Western Europe at 7.9%, the lowest of the sub-regions).

Source: IRCC, Permit Rejection Rates  
by Region/Country

The rationale for increasing international student enrollment from North and sub-Saharan Africa is laudable: giving concrete expression to Canada’s linguistic duality in international education programming; supporting Canada’s francophone institutions and regions to meet their growth targets; advancing UN Sustainable Development goals and Canadian commitments to the Francophonie; and diversifying the number of source countries from which Canada draws international students. However, delivering on these goals has proven uneven.

The high rejection rates to date for study permit applications from countries from these regions can be attributed to a number of factors. Global Affairs Canada’s (GAC) Trade Commissioner Service, which has a strong track-record of success delivering on Canada’s international education priorities, had limited experience engaging with educational authorities or with accredited international education agents from these countries. IRCC, which has demonstrated time and again its ability to manage surges in demand for student applications, lacked familiarity with official records and documentation from these countries and

how to evaluate them. And “one-size-fits-all” criteria for assessing individual student financial risk or the likelihood of their returning home after completing their studies- resulted in inequities when applied to students from these lower-income regions.

The scale of the problem is daunting- since 2016, over a half a million well-qualified prospective international students have had their permit applications rejected.

Each rejection letter is not only personally devastating for the student who has successfully qualified for admission to a Canadian institution in their chosen field of study. It also arguably represents a failure of process: a waste of resources for the student and 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 that come through education to promote Canada’s global engagement and connections abroad.

CBIE is heartened that IRCC and GAC have acknowledged these systemic challenges and are working together to address them. CBIE is prepared to support these efforts and expects steady progress in terms of lower rejection rates for prospective international students from these regions.

It is imperative for IRCC to take decisive action to identify and redress systemic biases inherent in how international student visa requests are being processed.

Current approaches are producing inequalities that carry with them significant reputational risks- both for Canada and for our institutions. The human costs of these delays and high rejection rates for study permits is troubling. More to the point, given the extent to which Canadian governments and educational institutions have been proactively encouraging initiatives to expand international enrollment and the increasingly competitive global market for talent, they are unacceptable.

It is important that these failures of process are not seen by prospective international students to Canada as failures of respect.

Being more upfront about our intentions will better inform how we screen student visa applicants. To do that a whole of government approach is needed.

Employment and Social Development Canada (ESDC) needs to engage more effectively with industry, provinces and territories and community service organizations to identify labour market priorities that should inform student recruitment policies.

GAC needs to more clearly articulate Canada’s geopolitical interests in the context of international education so we can take advantage of the “soft-power” and the connections and networks successful IE programs can provide.

And IRCC needs to take practical steps to:

- improve its training for immigration officers, including placing an explicit focus on intercultural competence training;
- meaningfully assess algorithms currently being used for screening applicants for unintended bias; and
- explore the confluence of factors that explain why some visa offices have high refusal rates, including: the cultural resonance of guidance materials available to candidates applying for visas; whether “official documentation” submitted by candidates meets norms reviewers require; or if there are more dubious factors at play.

To that end, CBIE would also like to see a closer connection between IRCC’s policy apparatus and CBIE’s well-established Immigration Advisory Committee (IAC). Since 1994, the IAC has provided a focal point and neutral space for international student immigration advisors to work through policy issues of mutual concern. IAC can support IRCC efforts by providing early feedback and insight on proposed policy or program directions from those most likely to be affected by them. Regular, ongoing meetings between the IAC and IRCC would build trust and help ensure that well-intentioned changes to immigration policy do not result in unintended, negative consequences, and further, allow IRCC to accelerate policy solutions and innovations with the direct policy input of the international education sector.



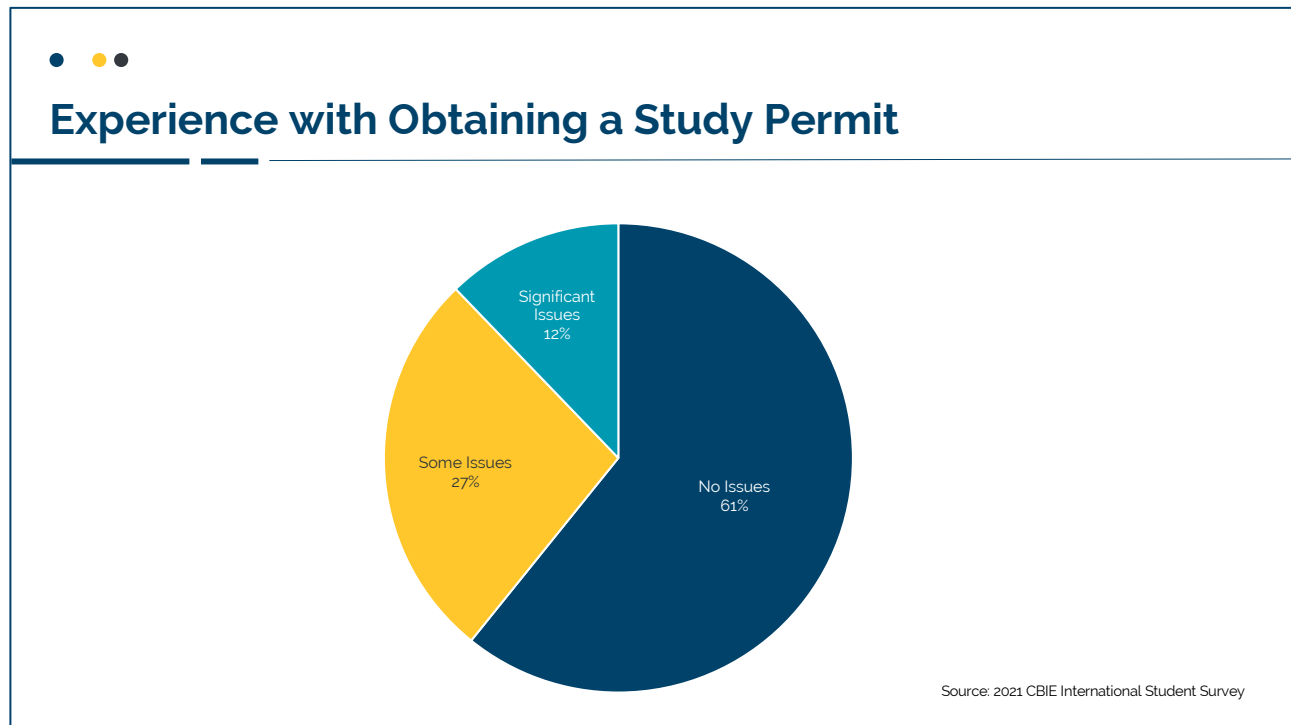
## CBIE’s Immigration Advisory Committee (IAC)

---



Established in 1994, the Immigration Advisory Committee identifies critical issues from the institutional perspective, in particular systemic issues affecting international students, and advances policy recommendations to Immigration, Refugees and Citizenship Canada (IRCC) to attempt to resolve them. The IAC serves as the communication liaison with CBIE members on immigration issues and facilitates the development of more effective policies, procedures and systems meeting the needs of international students and institutions.

CBIE's most recent biennial International Student Survey highlighted a number of concerns with respect to access to study permits and processing times. When asked to offer perceptions of Canada's performance in regard to obtaining study permits, 39% of international student respondents indicated that they experienced some or significant issues.



If to compare Canada's performance as good or very good- in so far as perceptions of student visa processing against our competitor countries, Canada's 32% good or very good rating has a much lower proportion than for other high volume country destinations with which Canada is competing. Suffice it to say, in this globally competitive market for talent- addressing these problems should be a priority for IRCC.



## Perception of Student Visa Processing vs Competitors

	GOOD/ VERY GOOD
CANADA	32%
AUSTRALIA	59%
UNITED STATES	52%
UNITED KINGDOM	78%

Source: Navitas, November 2022  
Agent Perception Survey

It is essential for IRCC to have the resources necessary to process international student visa requests in a timely way. CBIE is aware that IRCC is actively exploring new options for expediting and streamlining student visa processing. These range from using new AI tools to complement subjective assessments of applications by immigration officers, to adding additional processing capacity on the ground in countries and regions where there is high demand for study permits. CBIE supports and applauds these initiatives.

What CBIE will **not** support are simplistic solutions for improving timely assessments of study permit applications that have the effect of capping the overall number of applications IRCC reviews or limiting international student enrollment in Canadian institutions.

At a time when funding for and domestic enrollment in Canadian institutions is in decline, this approach would be short-sighted and counterproductive. It would also be in stark contrast to messaging from other federal departments and agencies, other levels of government and industry that are actively promoting Canada as a study destination of choice that provides qualified graduates a clear pathway to permanent residency.

Indeed, any initiative that would directly or indirectly limit international student enrollment in Canadian institutions- absent an extensive and inclusive process of dialogue and engagement amongst the many affected stakeholders- would have deleterious results. An effective cap on incoming students, would:

- generate unhealthy competition between provinces and territories, among regions and across institutions- to the detriment of small jurisdictions and institutions;

- lead to pressure on the government to assign international student quotas by jurisdiction, institution size, type, and program of study- regardless of market demand; and
- incent already cash-strapped institutions to focus their international student recruitment on existing markets in high source countries, rather than invest in new ones.

In regard to this latter point, one of the proposed directions referenced in GAC's new five-year International Education Strategy, expected to be unveiled later this year following public consultations, is to expand recruitment from non-traditional source countries. Canada presently draws international students from key source countries as identified in the graphic below. Increased dependency on existing source countries would leave Canadian institutions and Canada's business and research enterprise more vulnerable to geopolitical upheaval.



A cap on international student enrollment would also constrain Canada's ability to use international education (i.e., "soft power") to advance foreign policy objectives in certain regions. As noted earlier, 40% of international students in Canada plan to return to home after completing their studies. The more positive and successful their educational experience in Canada, the likelier they will be to serve as de facto ambassadors for Canada and use their contacts, networks and understanding of what Canada has to offer to mutual advantage. People-to-people contacts that facilitate down-stream cultural exchanges, collaborative research, partnerships and trade ties, all serve to advance Canada's interests.

CBIE is neither advocating a “laissez-faire” approach to international student enrollment nor suggesting that IRCC ignore the very real and substantive issues that international students to Canada are experiencing. IRCC can and must play a leadership role in supporting ongoing efforts to address some of the systemic problems affecting international students in Canada.

For example, federal-provincial-territorial immigration level planning agreements, which are updated annually, currently focus on selection criteria for immigrants, language requirements, labour market needs, settlement and integration services and funding arrangements. They make no reference to international students in Canada, how to plan for meeting their needs for housing, social, health and mental services, nor how they can help bridge talent gaps or meet provincial immigration targets.

In the next section of our brief, we address roles and responsibilities and broader issues of accountability for ensuring Canada and international students fully realize the benefits of studying in Canada.

### Summary List Recommendations from Part 1:

- 1. Any federal strategy that seeks to leverage the for-Canada benefits of immigration must acknowledge, in both policy and programmatic terms, the potential contribution of international students to Canada towards these objectives.*
- 2. If the immediate priority for updating Canada’s immigration policies is to address the labour market and demographic challenges highlighted in the IRCC discussion paper, the 800,000 plus international Canadian study permit holders (60% of whom have expressed an interest in remaining in Canada after completing their studies) are a critical part of the solution.*
- 3. Clearer lines of accountability and new governance mechanisms are required at the federal level to enable a whole-of-government approach to attract the best international students, provide them with a successful educational experience and incent those best able to contribute to Canada’s labour market and demographic imperatives to remain after graduation.*
- 4. IRCC should establish a dedicated immigration stream that clearly articulates Canada’s intentions in regard to offering a pathway to permanent residence for qualified international students whose skills are in demand now and into the future.*
- 5. The Government of Canada needs to use its convening power to facilitate ongoing and systematic engagement with and among other levels of government, educational institutions, community partners, settlement agencies and businesses vis-à-vis international education and international student recruitment.*

6. *Canada's immigration policies and international education policies must remain complementary and continue to reflect core Canadian values of inclusion, tolerance, fairness, generosity and international solidarity.*
7. *The resources available to IRCC to enable the timely processing of international study permits must be commensurate with demand.*
8. *Timelines for processing international study permits to Canada need to improve and become consistent with those of our competitors.*
9. *Prior to the Government of Canada designating any new "priority" country, region or sub-region for international student recruitment, IRCC needs to ensure its readiness for the decision by completing an impact assessment of how it may affect demand on its resources, staff orientation and training requirements and whether current procedures need to be adapted to avoid unintended negative consequences such as high rejection rates.*
10. *Where IRCC identifies consistently higher rejection rates for study permits from certain countries or regions, it needs to work with GAC and Canadian institutions that have accepted applicants for enrollment, to ascertain and address the root causes of these problems.*
11. *Where required, IRCC needs to take practical steps to provide intercultural competence training for immigration officers; review algorithms currently being used for screening applicants for unintended bias; and, explore the confluence of factors that explain why some visa offices have high refusal rates.*
12. *IRCC needs a more flexible approach for assessing study permit applications from prospective students from poorer countries or regions; current "one-size-fits-all" criteria for evaluating financial risk or the likelihood of their returning home after completing their studies, has resulted in inequities.*
13. *While CBIE acknowledges the potential for artificial intelligence to expedite and streamline processing international study permit applications, CBIE cautions that these tools be used to complement subjective assessments of applications by immigration officers, not replace them.*
14. *CBIE rejects any unilateral Government of Canada "solution" for improving timely assessments of study permit applications that has the effect of capping the overall number of applications IRCC reviews or limiting international student enrollment in Canadian institutions.*
15. *Any decision to limit international student enrollment in Canada should only be taken following consultations with international education stakeholders and pursuant to a clear consensus on how to proceed in order to avoid unhealthy competition between provinces and territories, among regions and across institutions and, leaving Canada vulnerable to geopolitical risk by being overly concentrated in current high source countries.*

## Part 2: Improving Policy and Program Integration across the Immigration Ecosystem

To fully realise the potential for Canada's immigration system to advance pan-Canadian demographic, economic and societal goals, it is essential to improve policy and program integration across the wider immigration ecosystem. This effort must include a particular focus on international students that takes into account their potential to add to the already significant contributions they make to Canada.

Suffice it to say that for international students, the limitations of current approaches are becoming increasingly obvious. The fact that IRCC and GAC have each initiated separate consultation processes with overlapping timelines, but different completion dates for what are clearly complementary issues, is challenging.

IRCC's process is focused on the future of immigration policy; GAC's on how to leverage international enrollment to advance Canadian priorities, among other considerations. With IRCC expected to issue over 800,000 international study permits in 2023, and with roughly 60% of international students to Canada expressing an interest in pursuing permanent residency after graduation, better-aligned processes would yield better-informed policy discussion- notwithstanding how closely each department is monitoring the other's efforts.



A coherent, integrated, and holistic approach would support efforts to encourage international students from a wide range of countries to make Canada their destination of choice for fulfilling their educational, personal and professional aspirations. Such a strategy would:

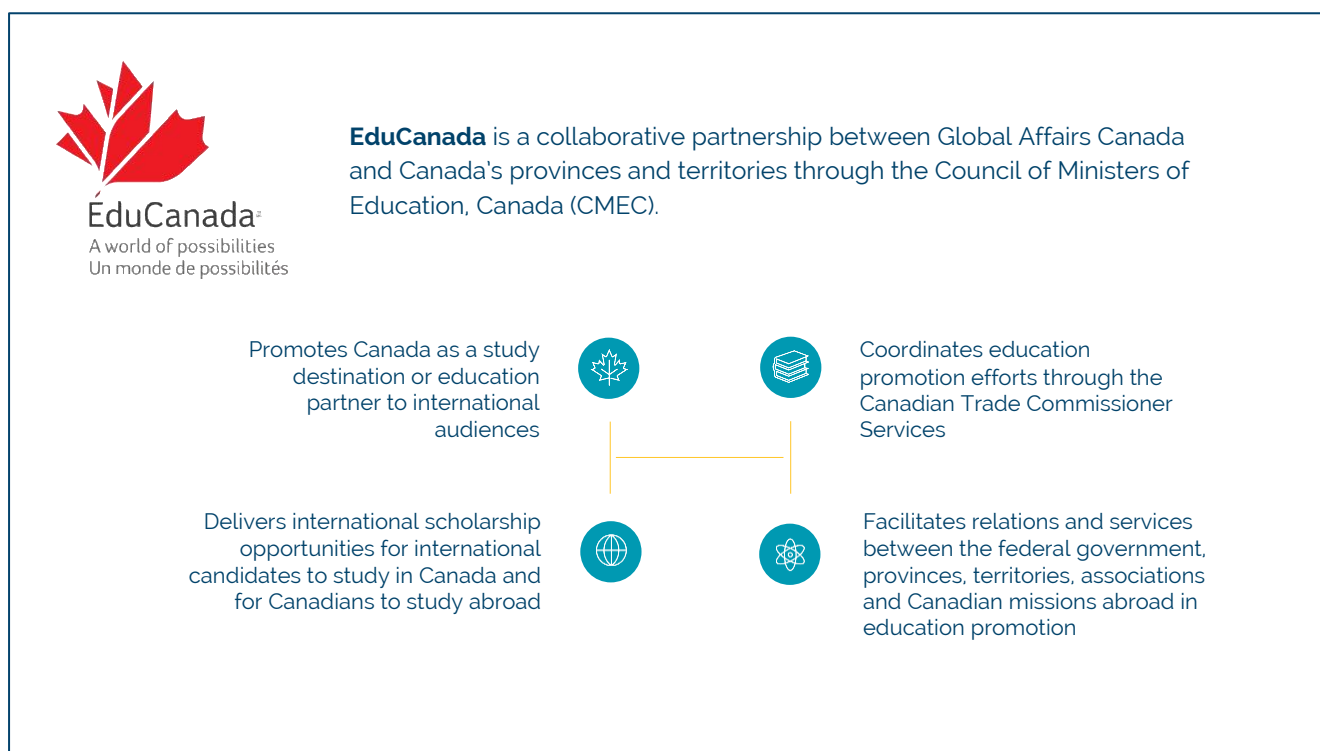
- address the longstanding data gaps that make it difficult for FPT governments, educational institutions, businesses, municipalities, and community service providers to plan for and assess the ongoing impacts of international enrollment on housing, social and other services;
- clearly delineate the roles and responsibilities of federal departments and agencies, provincial and territorial governments, educational institutions and community partners and stakeholders for creating an enabling environment that supports international students to be successful;
- bring all of these actors together on a regular basis to set priorities and assess progress towards these goals- rather than have each continue to work in isolation;
- inform and better calibrate GAC international education promotion and outreach initiatives;
- allow for the development of smart, targeted programs that match international students completing their studies in Canada whose skills are in demand and who will have the requisite professional qualifications and certifications, with communities and sectors that need and will value their presence; and
- provide IRCC with the evidence and business case it needs to provide a clear pathway to permanent residency for skilled graduates who want to remain in Canada.

It is a dubious proposition for GAC to unveil a new 5-year International Education Strategy for Canada that seeks to expand and diversify international student recruitment, use scholarship programs to target high-value students able to advance Canada's innovation agenda or to prioritize different countries or regions, if the strategy is not fully in synch with how and where IRCC's is planning to allocate its scarce resources. This has happened in the past; it should not happen again.

Top-down, CBIE believes the Government of Canada should establish a new function of Chief Talent Officer for Canada as a focal point of leadership for advancing a whole-of-government approach for recruiting and facilitating access to permanent residency for international students whose skills are in demand. The Chief Talent Officer's mandate would include engaging with business associations, the research communities and health services administrators, among others, to raise their awareness of the potential role international students can play in addressing labour market gaps and what they can do to facilitate pathways to permanent residency to retain the best talent. The Chief Talent Officer would also work with other levels of government to set goals in regard to international student recruitment and retention that would ideally be reflected within annual immigration level agreements.

Bottom-up, CBIE is already working with its member institutions to do its part to ensure the integrity of inbound student mobility to Canada.

For example, to bolster the integrity of the Canadian international student immigration process, often in partnership with the provinces, CBIE delivers certificate programs and professional development offerings to professional international student advisors and agents, based in Canada and abroad. And as noted in Part 1, CBIE's Immigration Advisory Committee works to identify critical issues from an institutional perspective, in particular systemic issues affecting international students, and advances policy recommendations to IRCC to resolve them.



As a complement to EduCanada certification, CBIE is also actively developing a *Code of Ethical Practice for International Education in Canada* encompassing institutions and the practitioners that serve within them.

Informed by CBIE's most recent International Student Survey, the Code will serve as an important ethical framework of commitments to provide international students with a quality experience that better connects them to the community. It will also articulate the need for a calibration of recruitment through a sustainability lens that takes account of institutions ability to effectively manage intake and meet the complex needs of those they recruit.

The Code will also eventually incorporate a framework for working with international education agents. The goal here is to ensure that Canadian institutions that rely on International Education Agents engage properly

qualified ones who engage ethically and transparently, and place a priority on quality candidates with a strong likelihood of successfully completing their studies in Canada.

To that end, institutions are working hard to ensure that they have adequate capacity—in-house, via peer support programs and through community partnerships—to on-board new students. This includes supporting them to access adequate housing, medical, mental health, and social services, as well as providing those who need to work or hope to remain in Canada after graduation, with relevant support.

On this latter front, CBIE and a number of its member institutions are already reaching out to businesses and economic development officers and to community service providers to raise awareness of how they can better capitalize on the expertise international students can provide- for the short and longer-term.

Based on the evidence assembled through its ongoing work on these issues, CBIE strongly supports the development of a new IRCC policy framework better attuned to the needs of international students as well as to the interests of Canada's institutions, private and voluntary sectors. This new framework should include a specific focus on removing or mitigating policy barriers that limit international students' access to paid and unpaid work, internships or community or volunteer experience.

What is abundantly clear from CBIE research is that the earlier and deeper international students can engage in Canadian society- through work, community service or as volunteers- the likelier they are to be successful in realising their personal, academic and professional aspirations, whether they stay in Canada or return home. These types of connections provide them with invaluable experience, better insight into Canadian culture and values and access to new contacts and networks they can draw upon after completing their studies to prepare them for the next stage of their lives. For those choose to remain, these connections can make the transition to permanent residency less daunting and more successful for themselves and their families.

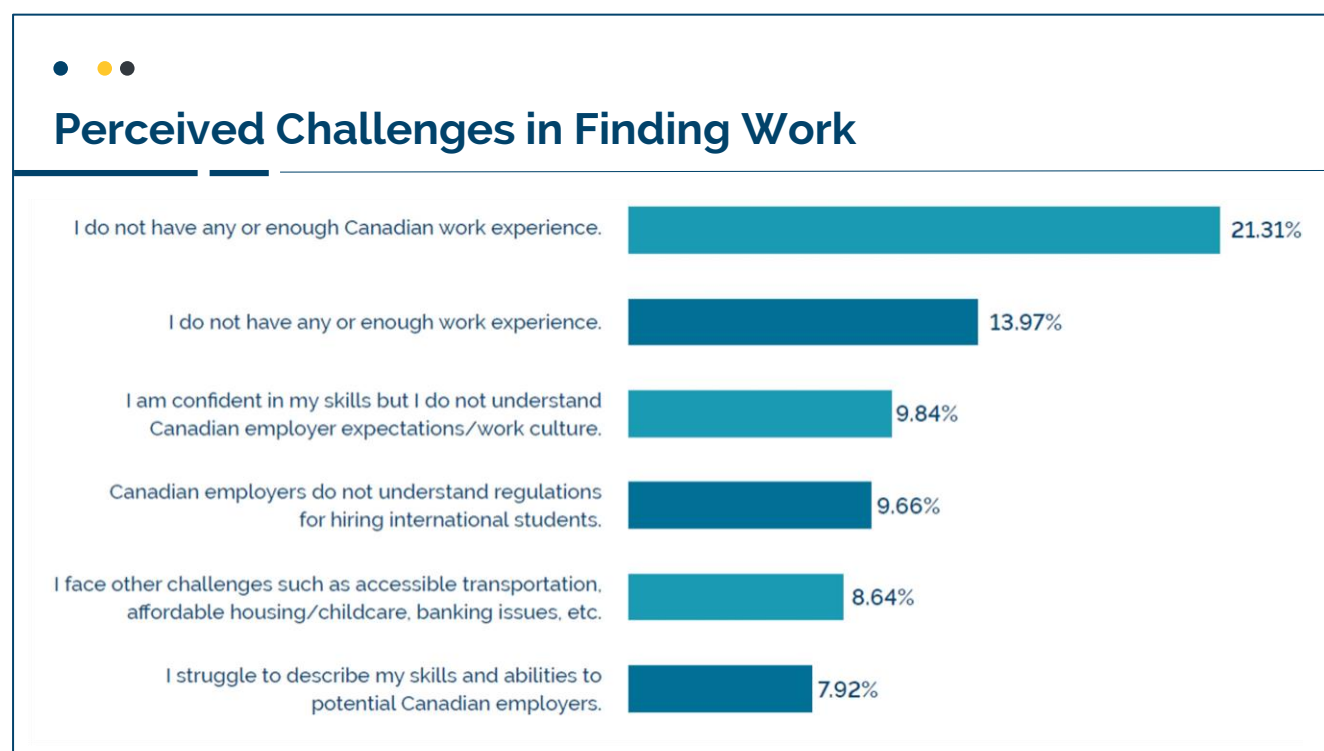
In a similar vein, enabling international students who need to work in Canada to support their studies is also an expression of Canadian values of equity and fairness. For many international students, the ability to work on a part-time basis—to pay-as-you-go—is critical to their decision (and ability) to study here. So too is obtaining practical experience as interns, via work-study programs or as volunteers to obtain certification in their chosen field of study.

It is important that Canada's international education strategy acknowledges, embraces and where necessary supports inbound students from all parts of the world and from all walks of life. And it is equally important that immigration policies affecting how and where international students can work- because they need to or are required to, are sensitive to these realities.

Throughout the COVID-19 pandemic response, the Government of Canada demonstrated commendable flexibility and generosity in supporting international students who needed to work extra hours or to extend their stays in order to complete their studies or certifications. A similar approach that focuses on removing

unreasonable barriers to international students forming early and deep connections in Canada through paid or unpaid work, should also be part of IRCC's policy toolkit.

In CBIE's most recent ISS, respondents flagged two things as problematic. First, that employers don't always value or appreciate the skills they bring to the market, don't know how to engage with them to provide opportunities for academic, personal or professional development or how to incent them to stay on after graduation. And second, a lack of awareness amongst Canadian employers about rules relating to the hiring of international students and how to navigate the immigration system or facilitate their retention post-graduation. These gaps need to be addressed.

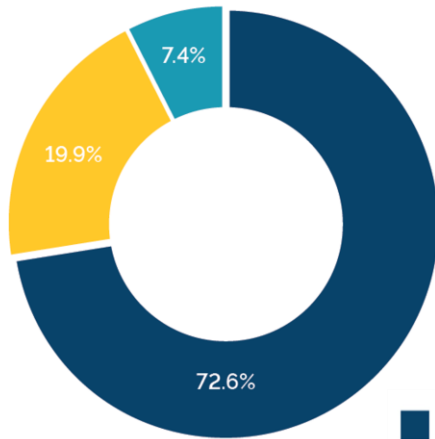


CBIE also notes that absent a deliberate strategy that encourages and supports smaller regions and communities to attract and retain international students, the stated demographic goals for Canada's immigration strategy are unlikely to be fully realised. While most immigrants opt to settle in larger urban centres, data from CBIE's latest ISS suggests that given the right circumstances, international students are more likely to be willing to remain in the communities where they completed their studies. This underscores the imperative for a more holistic and inclusive approach to effectively leverage the potential benefits to Canada international education can provide.

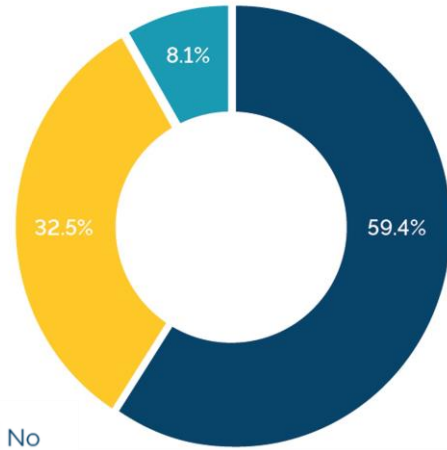


## Intentions to Stay in Canada

Plans to Apply for Post-Graduate Work Permit



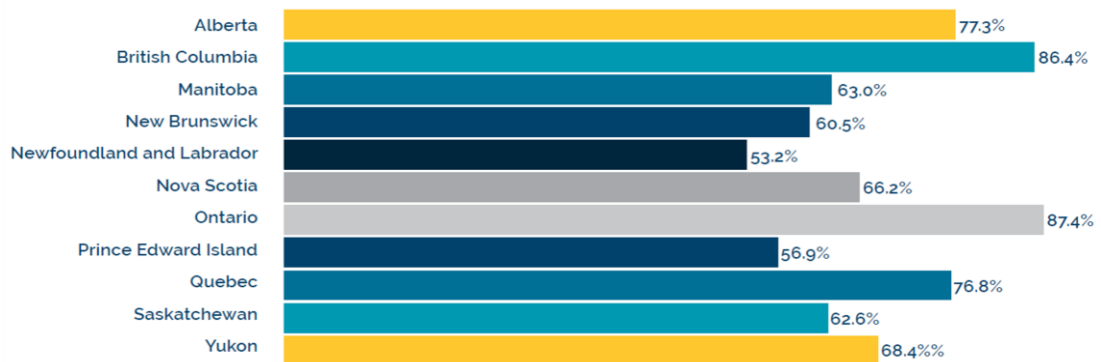
Plans to Apply for Permanent Resident Status in Canada



■ Yes ■ Unsure ■ No



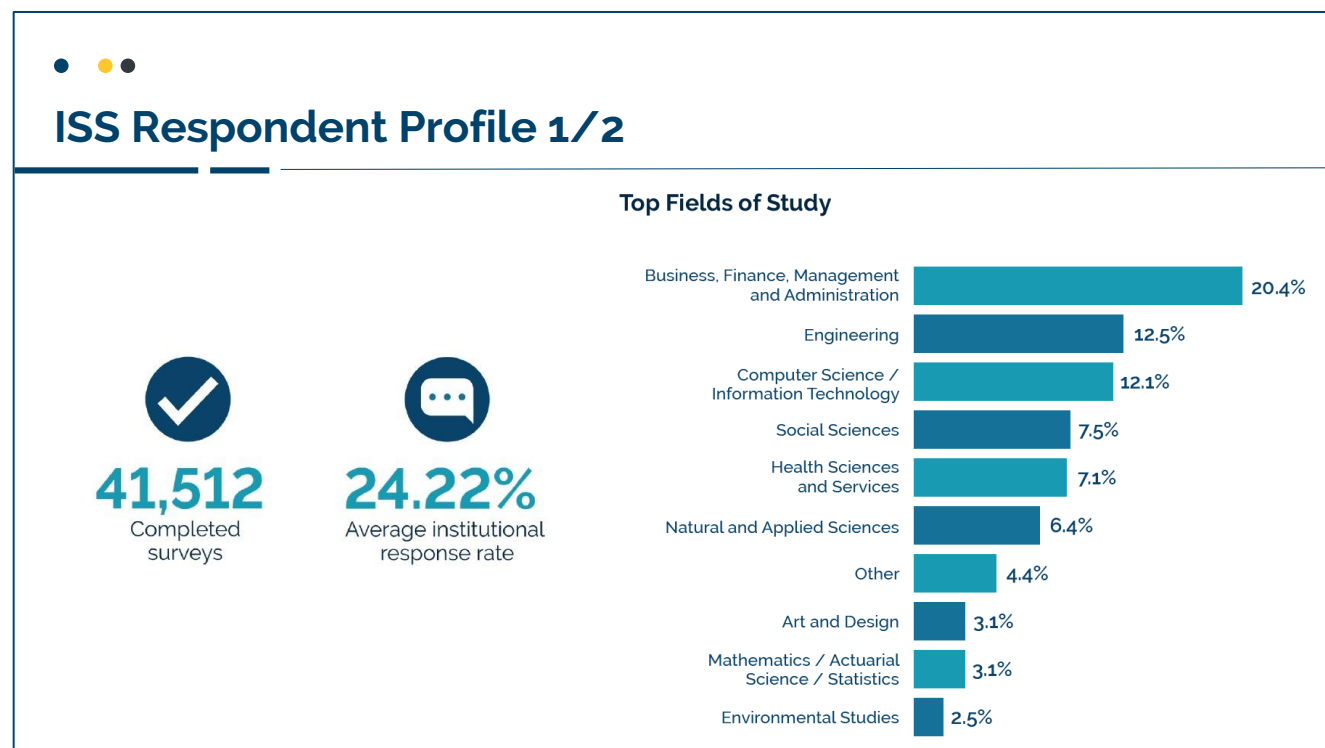
## Students Who Currently Live in the Province/Territory Who Intend to Stay After Receiving Permanent Resident Status



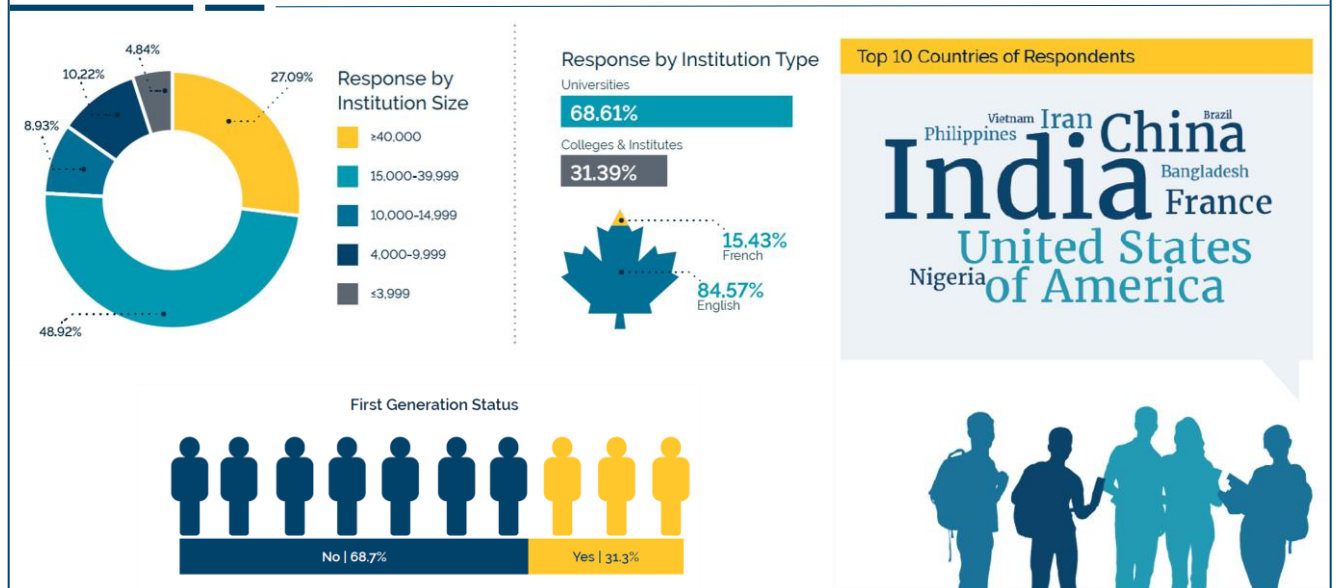
When asked why they would like to live in the selected province, 33.1% of respondents noted that they enjoy the lifestyle of the province, while 25.3% are concerned with employment opportunities, and 20.6% want to be close to family or friends.

Finally, CBIE is working diligently on initiatives that help connect together all of the players across the international education system ecosystem- institutions, communities, businesses, settlement agencies and all levels of government. As part of that effort, CBIE regularly convenes opportunities for dialogue, showcases domestic and international best-practices, undertakes biennial surveys of international students, and develops resources for international students, educators, and administrators.

CBIE is also working hard to bridge some of the longstanding data gaps vis-à-vis international student enrollment in Canada. Our goal is to become a focal point for up-to-date information by maintaining a data hub on international education. What makes for a successful international education experience? How do we stack up against other countries? What can institutions, communities and businesses do to help? Do international students and their Canadian peers perform equally well, or do results vary by source country or program of study? If not, why, and what can be done about it? How has Canadian training or certification affected international students' personal and professional success? How many graduates have immigrated to Canada and are working in their field of study- or in other sectors? Are more or fewer international graduates planning to remain in Canada after graduation? Why? How has Canada benefitted to date from international student enrollment and what else needs to be done to benefit even more going forward? Answers to these questions are crucial for informing our policy and program choices.



## ISS Respondent Profile 2/2



### Summary List Recommendations from Part 2:

16. *National leadership is required to bridge longstanding data gaps and enable all levels of government, educational institutions, businesses, municipalities, and community service providers to plan for and assess the impacts and benefits of international enrollment.*
17. *The roles and responsibilities of federal departments and agencies for creating an enabling environment that supports international students to be successful needs to more clearly delineated so that they can engage more effectively with provincial and territorial governments, educational institutions, community partners and other stakeholders on these issues.*
18. *IRCC and GAC should recognize the value of engaging formally with CBIE's Immigration Advisory Committee on an ongoing basis to assess the potential impacts of any proposed policy changes on immigration that may affect international students or to identify and address emerging issues and opportunities proactively.*
19. *The Government of Canada should establish a new function of Chief Talent Officer for Canada to lead a whole-of-government approach for recruiting international students whose skills are in demand and work with other levels of government to set goals and assign resources within annual immigration level agreements for international student retention.*

20. *The Chief Talent Officer should also engage with business associations, Canada's research community and with health services administrators, among others, to develop smart, targeted programs that match international students completing their studies in Canada with communities and sectors that need and will value their presence.*
21. *CBIE must do its part to contribute to the success of Canada's immigration programming, support informed dialogue on international education issues and empower its members to provide international students with a successful educational experience through initiatives like its biennial International Student Survey, the Code of Ethical Practice for International Education in Canada and by continuing to provide training and resources for international students, educators, and administrators.*

## Part 3: Streamlining Pathways to Permanent Residency for International Students

CBIE notes that the sole reference to international students in the IRCC Minister's mandate letter is direction to "Expand pathways to Permanent Residence for international students and temporary foreign workers through the Express Entry system." We also note that the IRCC's Discussion Document does not in any way acknowledge the unique and potentially enormous contribution international students can make to advancing at least two of the core agendas central to the discussion document, to:

- Contribute to Economic Growth
  - bridge short-term labour market needs/gaps
  - attract/retain talent for the long-term in critical growth sectors
- Address Demographic Imperatives/Resiliency:
  - meet the needs of an aging population (ratio of employed to retirees)
  - increase settlement in smaller regions/communities

Rather, the Discussion Document lumps international students in with other clusters of immigrants, without differentiating between them:

- *"The term "immigration system" refers to many things. It includes everyone that collectively supports the programs and services that bring foreign nationals to Canada as temporary residents (**visitors, students, and temporary workers**) or permanent residents, and ensures their successful integration into Canadian society...*

As noted earlier in our brief, IRCC needs to take a balanced approach to maintain the integrity of Canada's immigration policies and programs and to ensure their success. That effort must acknowledge the full range and depth of contributions international students can make to building a stronger, more resilient, innovative, and outward looking Canada.

For sure, international students can and are helping Canada to address labour market shortages and skill gaps across a number of sectors. They are essential to our economy and are already making a difference. And our immigration policies also need to take account of the critical contributions high-talent international students can contribute to our competitiveness and economic prospects, to our research enterprises, our health, social and cultural sectors and to emerging domains like green tech, bioengineering, climate change and machine learning. We need to ensure we can help channel that critical mass of knowledge and expertise to our advantage and to where it is most needed.

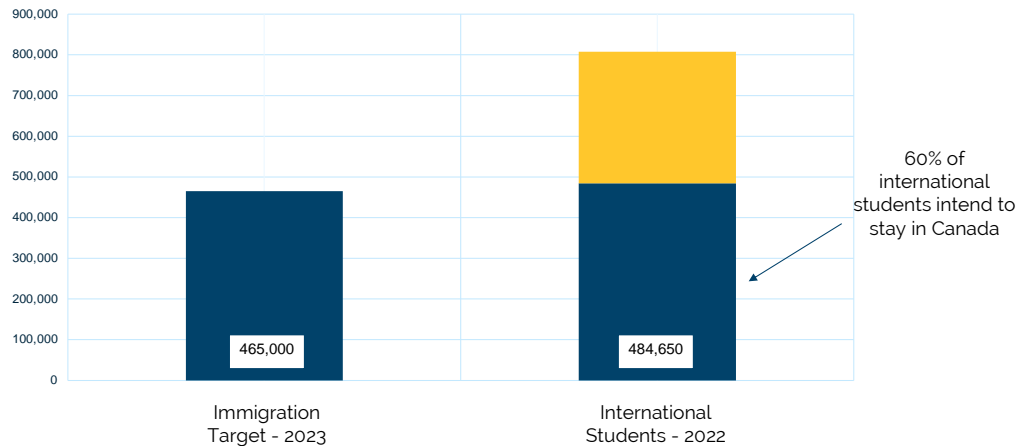
But that is only part of the equation. International students also add value to our institutions and communities in many other ways. Through their energy, ingenuity and creativity. By providing additional breadth of perspective and insight when tackling complex challenges. By exposing us to different cultures, food and music and art and by serving as intercultural interpreters, mediators and mentors- both on and off campus, in our workplaces and communities...

Whether they choose to pursue a pathway to permanent residency in Canada and use their talents and skills here, or choose to return home to realise their aspirations, our immigration policies need to fully support efforts that make their educational experiences in Canada as successful as possible.

CBIE believes the most effective and efficient means for Canada to achieve the bulk of its immigration goals is via a deliberate strategy to facilitate access to permanent residency for international students who want to remain in Canada after graduation. They are younger overall relative to other categories of immigrants. They have completed their studies in English or French. Their degrees and certifications are already recognized. Many have Canadian work experience. Most hope to stay. And they are already here and living in our communities- with a network of personal and professional contacts that can help them to find jobs, access health and social services and reduce pressure for longer-term settlement support services.



## Target Immigration vs. Number of Int'l Students



Source: CBIE International Student Survey, 2021

International students should form a special stream within our immigration system. If the Government of Canada is actively encouraging international students to enroll here because it views them as part of the solution to our economic and demographic challenges, it cannot then reject study permit applications from prospective students who indicate they want to remain in Canada after graduation. In our view, it is not in anyone's benefit for international students to be assessed under the same "temporary residency" criteria as tourists or temporary foreign workers.

In Section 2, we advocate for the creation of a new Chief Talent Officer for Canada function to help ensure all parts of our immigration, labour market, economic development and trade and humanitarian assistance policies are in synch. This would help address some of the current inconsistencies that characterize Canada's approaches on these important issues.

At a minimum, the existing immigration points system should provide a further clear advantage to candidates with degrees or certifications from Canadian institutions earned in Canada and who have Canadian work experience.

IRCC needs to empower international students to make smart choices that will be to their benefit and to Canada's. Part of that will require IRCC to identify and mitigate policy barriers that limit international students' ability to work enough to pay for their schooling, or acquire the on-site training, skills or work experience needed for certification in their field of study. And it needs to expand and champion programs that support international students to create connections at the person-to-person and at the community level, through volunteer programs and initiatives that support intercultural connection.

### Summary List Recommendations from Part 3:

22. *Canada's immigration policies should acknowledge that the most effective and efficient means for Canada to achieve the bulk of its immigration goals is via a deliberate strategy to facilitate access to permanent residency for international students.*
23. *Immigration policies need to recognize that the earlier international students make connections at the community level through work or voluntary activities, and the deeper these connections are, the likelier they are to achieve education success and contribute to Canada's success.*
24. *To reduce inequalities, IRCC should strive to minimize barriers that make it difficult for international students who need to work to finance their education, or to access work-integrated learning or post-graduate work experiences, to do so.*
25. *International students should form a special stream within Canada's immigration system, given that they are younger overall relative to other categories of applicants, meet Canada's language requirements, possess Canadian degrees and certifications, are established in our communities, often have Canadian work experience and already benefit from a network of personal and professional contacts.*
26. *At a minimum, the existing immigration points system should provide a further clear advantage to candidates with degrees or certifications from Canadian institutions earned in Canada and who have Canadian work experience.*

## CONCLUSION & RECOMMENDATIONS

The Canadian Bureau for International Education (CBIE) is grateful for the opportunity to contribute to Immigration, Refugee and Citizenship Canada's (IRCC) important and timely dialogue with Canadians on designing *An Immigration System for Canada's Future*. Our recommendations are as follows:

1. *Any federal strategy that seeks to leverage the for-Canada benefits of immigration must acknowledge, in both policy and programmatic terms, the potential contribution of international students to Canada towards these objectives.*
2. *If the immediate priority for updating Canada's immigration policies is to address the labour market and demographic challenges highlighted in the IRCC discussion paper, the 800,000 plus international Canadian study permit holders (60% of whom have expressed an interest in remaining in Canada after completing their studies) are a critical part of the solution.*
3. *Clearer lines of accountability and new governance mechanisms are required at the federal level to enable a whole-of-government approach to attract the best international students, provide them with a successful educational experience and incent those best able to contribute to Canada's labour market and demographic imperatives to remain after graduation.*
4. *IRCC should establish a dedicated immigration stream that clearly articulates Canada's intentions in regard to offering a pathway to permanent residence for qualified international students whose skills are in demand.*
5. *The Government of Canada needs to use its convening power to facilitate ongoing and systematic engagement with and among other levels of government, educational institutions, community partners, settlement agencies and businesses vis-à-vis international education and international student recruitment.*
6. *Canada's immigration policies and international education policies must remain complementary and continue to reflect core Canadian values of inclusion, tolerance, fairness, generosity and international solidarity.*

### **Part 1: Timely processing of international study permit applications**

7. *The resources available to IRCC to enable the timely processing of international study permits must be commensurate with demand.*
8. *Timelines for processing international study permits to Canada need to improve and become consistent with those of our competitors.*

9. *Prior to the Government of Canada designating any new “priority” country, region or sub-region for international student recruitment, IRCC needs to ensure its readiness for the decision by completing an impact assessment of how it may affect demand on its resources, staff orientation and training requirements and whether current procedures need to be adapted to avoid unintended negative consequences such as high rejection rates.*
10. *Where IRCC identifies consistently higher rejection rates for study permits from certain countries or regions, it needs to work with GAC and Canadian institutions that have accepted applicants for enrollment, to ascertain and address the root causes of these problems.*
11. *Where required, IRCC needs to take practical steps to provide intercultural competence training for immigration officers; review algorithms currently being used for screening applicants for unintended bias; and, explore the confluence of factors that explain why some visa offices have high refusal rates.*
12. *IRCC needs a more flexible approach for assessing study permit applications from prospective students from poorer countries or regions; current “one-size-fits-all” criteria for evaluating financial risk or the likelihood of their returning home after completing their studies, has resulted in inequities.*
13. *While CBIE acknowledges the potential for artificial intelligence to expedite and streamline processing international study permit applications, CBIE cautions that these tools be used to complement subjective assessments of applications by immigration officers, not replace them.*
14. *CBIE rejects any unilateral Government of Canada “solution” for improving timely assessments of study permit applications that has the effect of capping the overall number of applications IRCC reviews or limiting international student enrollment in Canadian institutions.*
15. *Any decision to limit international student enrollment in Canada should only be taken following consultations with international education stakeholders and pursuant to a clear consensus on how to proceed in order to avoid unhealthy competition between provinces and territories, among regions and across institutions and, leaving Canada vulnerable to geopolitical risk by being overly concentrated in current high source countries.*

## **Part 2: Improving policy and program integration across the immigration ecosystem**

16. *National leadership is required to bridge longstanding data gaps and enable all levels of government, educational institutions, businesses, municipalities, and community service providers to plan for and assess the impacts and benefits of international enrollment.*
17. *The roles and responsibilities of federal departments and agencies for creating an enabling environment that supports international students to be successful needs to more clearly delineated*

*so that they can engage more effectively with provincial and territorial governments, educational institutions, community partners and other stakeholders on these issues.*

- 18. IRCC and GAC should recognize the value of engaging formally with CBIE's Immigration Advisory Committee on an ongoing basis to assess the potential impacts of any proposed policy changes on immigration that may affect international students or to identify and address emerging issues proactively.*
- 19. The Government of Canada should establish a new function of Chief Talent Officer for Canada to lead a whole-of-government approach for recruiting international students whose skills are in demand and work with other levels of government to set goals and assign resources within annual immigration level agreements for international student retention.*
- 20. The Chief Talent Officer should also engage with business associations, Canada's research community and with health services administrators, among others, to develop smart, targeted programs that match international students completing their studies in Canada with communities and sectors that need and will value their presence.*
- 21. CBIE must do its part to contribute to the success of Canada's immigration programming, support informed dialogue on international education issues and empower its members to provide international students with a successful educational experience through initiatives like its biennial International Student Survey, the Code of Ethical Practice for International Education in Canada and by continuing to provide training and resources for international students, educators, and administrators.*

### **Part 3: Streamlining pathways to permanent residency for international students.**

- 22. Canada's immigration policies should acknowledge that the most effective and efficient means for Canada to achieve the bulk of its immigration goals is via a deliberate strategy to facilitate access to permanent residency for international students.*
- 23. Immigration policies need to recognize that the earlier international students make connections at the community level through work or voluntary activities, and the deeper these connections are, the likelier they are to achieve education success and contribute to Canada's success.*
- 24. To reduce inequalities, IRCC should strive to minimize barriers that make it difficult for international students who need to work to finance their education, or to access work-integrated learning or post-graduate work experiences, to do so.*

25. *International students should form a special stream within Canada's immigration system, given that they are younger overall relative to other categories of applicants, meet Canada's language requirements, possess Canadian degrees and certifications, are established in our communities, often have Canadian work experience and already benefit from a network of personal and professional contacts.*
26. *At a minimum, the existing immigration points system should provide a further clear advantage to candidates with degrees or certifications from Canadian institutions earned in Canada and who have Canadian work experience.*

## Contact

Larissa Bezo

President and CEO

Canadian Bureau for International Education (CBIE)

1550-220 Laurier Avenue West, Ottawa, ON

[lbezo@cbie.ca](mailto:lbezo@cbie.ca)

(613) 237-4820 ex. 236

The for-Canada benefits of inbound student mobility cannot be overstated.

International students can and are helping Canada to address labour market shortages and skill gaps across a number of sectors. They are essential to our economy and are already making a difference. And our immigration policies also need to take account of the critical contributions high-talent international students can contribute to our competitiveness and economic prospects, to our research enterprises, our health, social and cultural sectors and to emerging domains like green tech, bioengineering, climate change and machine learning. We need to ensure we can help channel that critical mass of knowledge and expertise to our advantage and to where it is most needed.

But that is only part of the equation. International students also add value to our institutions and communities in many other ways. Through their energy, ingenuity and creativity. By providing additional breadth of perspective and insight when tackling complex challenges. By exposing us to different cultures, food, music and art and by serving as intercultural interpreters, mediators and mentors- both on and off campus, in our workplaces and communities.