



Canadian Bureau for
International Education

Consultation Brief on Canada's International Education Strategy for 2024-2029

Submitted by: Canadian Bureau for International Education (CBIE)

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Introduction

CBIE is grateful for the opportunity to contribute to this important process of dialogue, review and reflection on a new 5-year international education strategy (IES) for Canada. Our brief reflects the consensus view of our pan-Canadian membership, which includes the full spectrum of education: universities, colleges, institutes, polytechnics, cégeps, school boards and language schools.

CBIE has been an active and committed interlocutor with Global Affairs Canada (GAC), Immigration, Refugees and Citizenship Canada (IRCC) and Employment and Social Development Canada (ESDC) in the development and delivery of key elements of previous international education (IE) strategies. Indeed, to support IRCC's recent consultations on *An Immigration System for Canada's Future*, CBIE has submitted a brief (Annex 1) that provides an IE perspective on immigration issues. Many of the themes and issues raised in this submission to IRCC are embedded within our recommendations to GAC for an updated IES for Canada.

We would like to begin by expressing our appreciation to GAC for the scope and ambition of the consultation process for the newest iteration of the IES, and the structured and inclusive engagement process GAC is following to solicit input. The thoughtful and substantive discussion documents that have been developed to frame the issues at play are also refreshing. Together, they underscore growing recognition of the critical importance for Canada to harness IE's extraordinary potential to enrich our society, build connection and community in an increasingly fractious but interdependent world. CBIE is optimistic that the approach to these consultations represents a willingness on the part of the Government of Canada to expand the scope of previous international education strategies to reflect the significant level of sophistication that numerous institutions are already taking in their international education endeavours, and to chart an ambitious and strategic path forward for the sector.

The Current IE Context

Over the past decade, the dramatic and rapid rise in the number of international students choosing Canada as their study destination has brought incredible benefits to Canadian institutions, communities, and campuses. As per GAC's commissioned studies on the economic impact of international education in Canada, international students now contribute over \$22.5 billion annually to the Canadian economy, support over 220,000 jobs and account for a substantive portion of the tuition fees earned by Canadian education institutions. Moreover, these benefits extend far beyond dollars and cents—international students add to the cultural richness of campus life and their diversity contributes invaluable breadth of perspective throughout our learning environments. The educational experience international students in Canada receive fosters long-term linkages and networks that are of immeasurable benefit to Canada's future prosperity—whether they remain after graduation, move back to their home countries, or go elsewhere to apply their acquired skills.

IE will also play a key role in supporting IRCC to meet the objectives outlined in its discussion paper for *An Immigration Plan to Grow the Economy*. These are to pursue an immigration strategy that helps businesses find workers and to attract the skills required in key sectors to manage the social and economic challenges facing Canada. With IRCC expected to issue over 800,000 international study

permits in 2023, and with roughly 60% of international students to Canada (480,000) expressing an interest in pursuing permanent residency after graduation, there is a huge opportunity for Canada to achieve these goals via a deliberate strategy to facilitate access to permanent residency for international students.

Realising the full potential of this rich talent pipeline will require a concerted effort to channel that critical mass of knowledge and expertise to our advantage and to where it is most needed. But it would be dangerous to simply assume continued effortless growth in demand for international student enrollment in Canadian education institutions. The IE sector is a globally competitive one. Canada is vying with other countries for market share and for the best talent. If Canada fails to uphold its end of the bargain with international students, if we do not provide a first-rate educational experience, our global reputation as a study destination will be diminished.

The unprecedented surge in international enrollment in Canada over the past decade is giving rise to numerous issues of significant concern that are increasingly the subject of high-profile media attention. Lengthy delays in processing international student visa applications, high rejection rates for applicants from certain regions and delays in obtaining post-graduate work permits are problematic. So too are issues like the unethical practices of some education agents and recruiting companies, shortages of adequate, affordable student accommodations, a lack of diversity in some classrooms and oversaturation of international students in certain programs and destination cities, the mental health, financial and employment challenges many international students experience, and challenges with integration into Canadian communities and workplaces. There is much work to be done to address these issues to secure Canada's long-term leadership as an international education leader.

While international education is a critical trade commodity and industry, it is also an important strategy to build human capital, an instrument for foreign policy, and a catalyst for global partnership and engagement. Decisions to expand international education exchanges with certain countries or regions, to use IE scholarships to develop critical capacity in lower-income countries or to engage with Canadian alumni in leadership positions in industry and government around the world, all advance Canada's interests, both nationally and globally.

IE also has the potential to foster understanding, empathy, respect and collaboration among nations by engaging leaders through international collaboration across sectors to advance progress towards a more sustainable future for all. As a member of the Network of International Education Associations (NIEA), CBIE recently joined sister associations across the globe in submitting a policy brief to UNESCO as part of the World Higher Education Conference (WHEC2022) making the case for increased international cooperation through education to tackle the world's most pressing challenges of our times and to advance the ambitious agenda of the UN's Sustainable Development Goals. In fact, in a recent survey of the senior internationalization officers within our member institutions, the majority indicated that they had a mandate to integrate the SDGs in their internationalization efforts. While advancing the SDGs as a conceptual goal becomes increasingly important within institutions, as was demonstrated in our survey, there is a growing need for global engagement offices to support international partnerships that produce tangible outcomes in alignment with this objective. As noted in the NIEA policy brief, internationalization of higher education *"gives unique opportunities to individuals and builds bridges between institutions and nations. Intense people-to-people cooperation in .. education...heightens the*

awareness of our common humanity and destiny and sets the foundation for collaborative progress towards a more sustainable future for humankind.”

CBIE's recommendations for Canada's 2024-2029 International Education Strategy:

Rather than respond separately to each of the thematic discussion papers GAC has issued for this consultation process, CBIE has opted instead to present a series of observations and topics that advocate for a fresh approach to IE planning and programming at the federal level. In our view, most of the issues flagged in the discussion are interdependent and require comprehensive, integrated solutions.

CBIE's recommendations will be presented as follows:

- 1. Adopting a comprehensive, whole-of-government and sector-wide approach to international education**
- 2. Strengthening Canada's global brand: an ethical approach**
- 3. Labour market needs and immigration pathways**
- 4. The diversification imperative**
- 5. Investments in scholarship programming**
- 6. Securing a long-term strategy for outbound student mobility**
- 7. Creating a robust approach to international education data**

1. Adopting a comprehensive, whole-of-government and sector-wide approach to international education

Reflecting the real scope of international education

A comprehensive definition of IE today necessarily needs to encompass more than just the inbound mobility of international students onto Canadian campuses or the outbound mobility of Canadian students to learn a new culture, language or experience different teaching methods and academic environments. The current international education strategy falls short in acknowledging the full breadth, scope and potential of Canada's IE sector.

In reality, the work of the international education sector in Canada encompasses a broad range of internationalization initiatives and dimensions, including, but not limited to:

- The **inbound mobility** of international students, scholars and faculty who come to learn and engage in research and teaching in Canada and on Canadian campuses or through virtual means;
- The **outbound mobility** of Canadian students, scholars and faculty who travel abroad, and more recently who may also engage virtually, in learning, research and teaching abroad;
- Institutional partnerships between Canadian and international education institutions around the world that facilitate **exchanges and the two-way mobility of students, scholars and faculty for purposes of learning, research and teaching**;
- Institutional partnerships between Canadian and international education institutions and individual researchers and faculty (and/or global consortia) that facilitate **research collaboration** across the broad range of academic and scientific research areas, some of which may potentially lead to the commercialization of research, in partnership with Canadian and international companies;
- Institutional partnerships between Canadian and international education institutions and individual researchers and faculty (and/or global consortia), as well as **technical cooperation** projects with foreign governments and civil society organizations, that serve to contribute to the **global sustainable development** agenda (as identified in the Agenda 2030 of the United Nations and the associated Sustainable Development Goals (SDGs) and to **human capacity building** around the globe with a focus upon ODA countries;
- Institutional partnerships between Canadian and international education institutions in **designing and delivering co-curriculum and/or establishing branch campuses or similar institutional structures** for the delivery of Canadian curriculum or co-curriculum abroad, and through other forms of **transnational education** such as international/cross-border programs;

- Institutional partnerships between Canadian and international education institutions in developing **joint programming and/or collaboration to internationalize domestic Canadian curriculum** to ensure that learning across Canadian campuses is inclusive, global in nature and exposes Canadian students, including those who are not able to travel, to global learning and, promotes global citizenship and global competence development from home; and
- The harnessing of **scholarship programs** and frameworks at institutional, provincial and national levels to advance and catalyze the above-noted areas of collaboration between Canadian institutions and researchers/faculty and international counterparts with the objective of broadly building people-to-people ties and to advancing Canada's global engagement through education.

Each of these dimensions contribute to Canada and serve to advance our global engagement and global contributions. CBIE is hopeful that a more comprehensive and strategic definition of IE for Canada within the framework of Canada's next IES will open the door for the formal engagement of a broader range of departments, agencies and institutions under the strategy.

Building a more comprehensive and integrated approach to IE planning and accountability

The next 5-year IES must comprise a whole-of-government and sector-wide strategy to ensure Canada is taking a more comprehensive and strategic approach to international education as outlined above. Even with the existing emphasis on international education as a trade sector, we must ensure that Canada is delivering the true value of what is sold to students under the Edu-Canada brand. To give international students a positive and successful study experience, Canada needs to support them well from the time they apply to study with a Canadian institution, through to post-graduation and transition to work. This requires an approach which goes far beyond issues under the immediate purview of GAC.

The economic impact of Canada's burgeoning IE sector now exceeds that of the auto parts, lumber and aerospace sectors. Just as these traditional, globally competitive sectors have benefitted from integrated policy, program and regulatory planning and investments in critical infrastructure, Canada's IE sector also requires attention and nurturing to remain strong. It is vitally important for policymakers to treat IE as a sector and approach it more strategically. This approach goes far beyond viewing international education as a trade sector under the purview of GAC.

Accountability for the success of Canada's IE sector is shared and diffuse. But that reality need not limit the sector's various stakeholders from working collaboratively to advance the sector's standing. If anything, the sector's extraordinary potential should incent the Government of Canada to both lead by example within its own sphere of influence and facilitate constructive, focused dialogue and collaborative action by system stakeholders. While Global Affairs Canada is leading the process to design a new 5-year IES, the strategy is about much more than its departmental foreign policy and trade mandate.

CBIE recognizes that GAC has a leadership role in defining Canada's IE goals and commitments in multilateral fora and on the global stage. Global Affairs Canada also represents Canada's IE interests throughout the world, managing scholarships programs, serving as an information conduit to prospective students, promoting the *Edu-Canada* brand, helping Canadian institutions identify leads and partners and by organizing education.

IRCC also plays a number of key IE roles. IRCC is responsible for assessing international student visas requests, issuing work permits, providing international students with information on pathways for temporary or permanent residency in Canada and more generally in advising on and implementing immigration policies.

ESDC's IE role includes working with industry, labour, professional associations and community groups to identify short-term labour market needs and long-term skills gaps that international students can help address. The recent increase in the number of hours international students in Canada can work, and decisions to facilitate pathways to permanent residency for international students in high demand areas like health services delivery and STEM, were all informed by ESDC's research. ESDC also plays an important role in fostering skills development for Canadian students as per the department's leadership over the Global Skills Opportunity pilot program as part of the current IES.

Beyond this, numerous other federal departments, from ISED, to Housing, Public Safety, Gender Equality and Indigenous Affairs have a stake and a role to play in ensuring the success of Canadian IE policies and programming. For example, ISED and the granting councils (SSHRC, NSERC, CIHR) and the significant investments they make in international scholarships, international research collaboration and international research training opportunities are notably absent from the current strategy. This represents a huge component of institutions' international education endeavours. The development portfolio at GAC and its investments in programming and scholarships which many institutions are involved in as part of their approach to international education can also be further integrated.

Furthermore, other levels of government, educational institutions, professional associations and the private and not-for-profit sectors also play key roles in Canada's international education sector.

Given the extent and speed with which Canada's IE sector has evolved, it is time to rethink and revitalize current mechanisms for coordinating IE at the federal level. Current ones are not working well enough, siloed thinking continues to be problematic and the front-line expertise of Canada's IE sector is often left fallow. Those directly affected by, or who benefit from, Canada's IE policy and program decisions, need to play an active and ongoing role in ensuring IE delivers positive results on the ground and at the community level while supporting international and domestic students, faculty and staff in their international education endeavours. This requires inclusive processes to engage Canada's IE community in priority setting, program design and implementation.

As a starting point to foster further inter-departmental and intra-sector collaboration, CBIE recommends more regular structured dialogue to convene the sector on issues of importance. This would take the form of a biennial pan-Canadian IE Summit that brings together representatives from all levels of government, educational institutions, industry, labour and professional and community associations, to

identify and address issues of mutual interest and concern with respect to Canada's IE programming. This Summit could be hosted in tandem with CBIE's annual international education sector conference – Canada's largest annual gathering of Canadian IE practitioners and leaders. Furthermore, through these dialogues, a series of pilot projects could be created to test innovative approaches for addressing issues the sector is facing which could later be scaled up. For example, such projects could work to actively connect-the-dots across the international student recruitment-education-graduation-permanent residency continuum in sectors critical to Canada's future prosperity such as artificial intelligence and machine-learning, bio-manufacturing, engineering, green energy and health sciences.

Supporting this type of undertaking will require tight coordination across federal departments and agencies (GAC, IRCC, ESDC and lead sectoral departments), educational institutions (training/research opportunities), provinces and territories (needs assessment/priority-setting), the private sector (work experience/talent management), professional and labour associations (accreditation), host community (health and social supports), and so on. While there are numerous institutionalized processes already in place at the national level through which Canada's IE community can advocate for specific policies or programs, these tend to focus on a narrow set of policy issues or concerns specific to the host institution. Regrettably, there are currently no effective mechanisms in place to facilitate dialogue on IE or advance such cross-cutting initiatives.

Given the pace at which the IE sector is evolving, Canada's IE strategy and programming needs to be nimble enough to allow for adjustments, evolution and response to opportunities that occur in the midst of the five-year duration of the strategy. The biennial summit and pilot projects proposed would support momentum and progress on issues as they evolve in a shorter time horizon – and help to advance a coherent IE agenda for Canada that seamlessly integrates policy and programming decisions, with a more integrated and less-siloed approach.

GAC and TCS Leadership

In addition to the recommendations that CBIE has made above regarding the integration of other federal departments into the leadership and execution of the next IE strategy, CBIE also recognizes the crucial ongoing stewardship role that GAC plays in leading the IE strategy. CBIE therefore encourages the GAC TCS to strengthen its capacity to advance the sector's priorities by further connecting with its stakeholders and leveraging their frontline knowledge and expertise in accordance with a more comprehensive approach as outlined above.

As a starting point, GAC should elevate the profile of its education trade commissioners in-market to reflect the strategic importance of the IE sector Canada. There is also a need to elevate the visibility, consideration and support given to IE within the diplomatic posts beyond the trade commissioners assigned with a responsibility for IE to include political affairs, development, as well as the heads of mission. IE programming and international scholarships represent more than just a means of leveraging Canada's trade and foreign policies or extending Canada's "soft power". As noted earlier, the sector now generates more economic activity in Canada than the lumber, auto parts and aerospace sector. It is part of the solution to Canada's labour market and demographic challenges. It enriches our culture and allows for invaluable people-to-people connections. And each of the 800,000 international students

who now annually choose Canada as a study destination should be acknowledged as de facto champions and advocates for Canada's interests.

Second, the TCS needs to view the sector in strategic terms, not simply transactional ones. Embracing a broader vision and framework for IE will necessarily shift how GAC gives expression to IE in policy and programming terms. This will require TCS officials and other key GAC representatives on mission (including heads of mission) to receive specialized training on how to advance Canada's IE interests as well as country-specific orientation on IE opportunities. Canada's IE sector is well-equipped to deliver this type of support.

Third- building on this- GAC needs to develop metrics to evaluate the performance of its TCS in advancing IE priorities for Canada. This can range from convening an annual Canada IE Day showcase, to engaging with Canadian international scholarship alumni in government, business, and academic settings to identify leads and opportunities for educational or technical exchanges for Canadian institutions or for outbound Canadian students. Where Canadian educational institutions are seeking to partner with local counterparts or market their services, they should be able to count on the same level of support that Canadian businesses receive. TCS officials should be visible and present to support their efforts; based on feedback from CBIE members, the sector desires greater visibility and engagement with the TCS in markets.

Recommendation 1: The next IES needs to acknowledge the full breadth, scope and potential of Canada's IE sector, and comprise a whole-of-government and sector-wide strategy to ensure Canada is taking a more comprehensive and strategic approach to international education through engagement of a broader range of federal departments, agencies and institutions in its execution.

Recommendation 2: The next IES must ensure Canada is delivering the true value of what is sold to students under the Edu-Canada brand. The strategy must advocate for and advance efforts to provide effective support to international students from the time they apply to study with a Canadian institution, through to post-graduation and transition to work.

Recommendation 3: Policymakers need to better acknowledge the myriad of for-Canada benefits of IE and provide it the same level of focused, strategic attention and support as other priority growth sectors.

Recommendation 4: CBIE recommends that the IES include funding to support more regular structured dialogue to convene the sector on issues of importance in the form of a biennial pan-Canadian IE Summit that brings together representatives from all levels of government, educational institutions, industry, labour and professional and community associations, to identify and address issues of mutual interest and concern with respect to Canada's IE programming. Furthermore, through these dialogues, a series of pilot projects could be created to test innovative approaches for addressing issues the sector is facing which could later be scaled up.

Recommendation 5: GAC should embrace a broader vision and framework for IE, make advancing IE a key consideration across the department beyond the TCS, develop relevant performance assessment criteria and work with Canada's IE sector to provide specialized training on how to advance Canada's IE interests as well as country-specific orientation on IE opportunities.

2. Strengthening Canada's Global IE Brand: An Ethical Approach

CBIE is working closely with its member organizations on a number of fronts to give concrete expression to its longstanding commitment to promoting ethical IE practices and to supporting rigour and professionalism across Canada's IE sector.

CBIE is currently working on an updated *Code of Ethical Practice for International Education in Canada* to reflect the significant evolution of the international education sector since CBIE's Code was first written in 2013. The Code will require institutions to commit to the values of *Quality, Equity, Inclusion, Partnership* and provides them with ethical guidelines to follow and against which they can assess their own performance. CBIE is also working to draft a companion *Code of Conduct for Working with International Education Agents* that will provide an ethical framework for institutions to apply when assessing potential international education agents and managing recruitment partners.

To support and inform these objectives, CBIE regularly hosts multi-stakeholder roundtables, discussion forums, surveys international students in Canada and develops, delivers, and administers training and professional certification programs for IE professionals, including for Registered International Student Immigration Advisors.

As a complement to these efforts, CBIE is prepared to work with GAC and the Council of Ministers of Education, Canada (CMEC) to lead a multi-stakeholder effort to build ethical requirements into the Edu-Canada brand. The Brand should incorporate a commitment to ethical IE and more clearly articulate the imperative for Designated Learning Institutions to demonstrate their commitment to and capacity for delivering values-driven IE programming. Based on consultation and engagement, the CBIE *Code of Ethical Practice for International Education in Canada* and companion *Code of Conduct for Working with International Education Agents* could be expanded beyond CBIE membership and used by GAC and CMEC as part of the Edu-Canada brand requirements.

Through its marketing efforts under the Edu-Canada brand, GAC has a unique opportunity to contribute to the capacity building and awareness raising of Canada's prospective international students on the appropriate ways for them to seek immigration-related advice as it relates to their study permit submissions. Prospective students would benefit from key messaging that encourages them to seek advice from authorized individuals/entities. Such proactive messaging could serve to counter the messaging of unscrupulous agents and actors within the international student recruitment space.

There are a number of other considerations that Canada needs to take in developing a more ethical leadership approach to international education to ensure that it is inclusive, positive, and sustainable for

all involved. This includes ensuring that existing marketing, policies and programming do not serve to perpetuate inequalities or colonial approaches. This may require a shift in approach of how international education actors pursue recruitment and partnerships to facilitate access in innovative and respectful ways, and to ensure reciprocity in relationships developed.

In addition, future programming must actively encourage further participation and support for underrepresented groups such as through dedicated scholarships and opportunities through the Global Skills Opportunity program. The IE sector is well placed to contribute to other Canadian national priorities such as supporting Truth and Reconciliation efforts. Many institutions are leading by example in this respect, including through Indigenous faculty-led collaborations with Indigenous groups around the world, actively decolonizing curriculum and their approach to international engagement, and ensuring that education and awareness-raising about Truth and Reconciliation is embedded in programming for international students.

The sector must also be more mindful in mitigating its environmental impacts. As a signatory of the global Climate Action Network on International Education (CANIE) Accord, CBIE has committed to serve as a global leader among associations in the IE sector by advancing its own innovative *Climate Justice Action Plan*. The plan will advance UN Sustainable Development Goals by committing CBIE to taking measurable actions that build climate resilience and to report on efforts to reduce the carbon footprint associated with the 800,000 international students studying in Canadian institutions. Accordingly, CBIE encourages GAC to not only track and report on the economic impacts of IE, but also on the overall environmental impacts of the sector- at home and globally. Further, the new IES provides Canada with a unique opportunity to acknowledge the importance of advancing climate action and sustainability through IE. This necessarily needs to begin with an understanding of the environmental impact of Canada's IE sector.

Recommendation 6: The Edu-Canada Brand should incorporate a commitment to ethical IE and more clearly articulate the imperative for Designated Learning Institutions to demonstrate their commitment to and capacity for delivering values-driven IE programming. The CBIE Code of Ethical Practice for International Education in Canada and companion Code of Conduct for Working with International Education Agents currently under development could be expanded beyond CBIE membership and used by GAC and CMEC as part of the Edu-Canada brand requirements.

Recommendation 7: GAC should leverage its Edu-Canada brand marketing channels and resources to educate prospective international students on the appropriate ways for them to seek immigration-related advice in the submission of their study permits to Canada.

Recommendation 8: Canada needs to take a global leadership role in developing a more ethical approach to international education to ensure that it is inclusive, positive, and sustainable for all involved. This includes ensuring that existing marketing, policies and programming do not serve to perpetuate inequalities or colonial approaches. Future programming must actively encourage further participation and support for underrepresented groups such as through dedicated scholarships and opportunities through the Global Skills Opportunity program.

Recommendation 9: CBIE encourages GAC to not only track and report on the economic impacts of IE, but also on the overall environmental impacts of the sector- at home and globally.

3. Labour Market Needs & Immigration Pathways

CBIE has made a number of recommendations to IRCC in its Consultation Brief on *An Immigration System for Canada's Future* submitted to IRCC in April 2023 (see Appendix 1) namely pertaining to:

- Timely processing of international study permit applications
- Improving policy and program integration across the immigration ecosystem
- 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

These measures are essential for the success of Canada's international' education sector and Canada's long-term labour market and immigration goals. There are reputational risk issues associated with the timely processing of all study permit requests. Canada is in competition with other countries for the recruitment of top global talent. Having international students who have already been accepted by their host institution face lengthy delays and uncertainty in obtaining their student visas will inevitably begin to erode our global brand. Recent trends with 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. It is imperative that IRCC improve visa processing times and take decisive action to identify and redress systemic biases inherent in how international student visa requests are being processed.

In a similar vein, Canada cannot credibly claim to be prioritizing recruitment of global student talent while tolerating long-delays for qualified applicants seeking permission to remain in Canada after completing their studies. If Canada is publicly stating that its IES is focused on bridging critical skill gaps, if is emphasizing STEM recruitment with the incentive of providing a pathway to permanent residency, it needs to be able to give operational and programmatic expression to these objectives.

Further policy and programming coherence between IRCC and other pertinent departments is required to achieve Canada's desired goals. CBIE has subsequently recommended that 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.

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.

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.

Within this stream, pilot programs should be created which focus on the labour market needs of particular regions or sectors in Canada. Such programs would allow for the streamlining of international students into specific programs of study, through the PR process and directly into jobs to fill identified labour market gaps. This fast-tracking of select international students will better meet both Canada's needs and the interests of the students involved. Having a PR stream within Canada's international student stream, could also serve to manage the expectations of the 800k+ international students, that only a portion of them can realistically secure a long-term plan for life in Canada.

Recommendation 10: It is imperative that IRCC improve visa processing times and take decisive action to identify and redress systemic biases inherent in how international student visa requests are being processed.

Recommendation 11: 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.

Recommendation 12: International students should form a special stream within our immigration system, wherein their study permit applications are not rejected for indicating that they want to remain in Canada after graduation. Furthermore, pilot programs should be created which focus on the labour market needs of particular regions or sectors in Canada. Such programs would allow for the streamlining of international students into specific programs of study, through the PR process and directly into jobs to fill identified labour market gaps.

4. The Diversification Imperative

On the issue of diversification, CBIE recognizes that there may be compelling geopolitical, economic or humanitarian reasons for GAC to designate a specific country or region as a potential IE “priority”. The focus on diversifying source markets for international students to mitigate risks and shocks to the sector remains imperative. CBIE recognizes that the diversification enrollment objectives that were laid out in the 2019-2024 IE Strategy were largely stalled as a reality of the pandemic.

As GAC looks to update these priority countries and regions, CBIE recommends ongoing engagement with other federal departments and with stakeholders directly affected by these decisions. It is important to ensure that expectations are realistic and that there is a high state of operational readiness for a surge in enrollment demand from these newly designated regions. CBIE and other pan-Canadian educational associations have extensive IE experience that is all-too-often underutilized. Through their contacts, networks and alumni, they can offer a realistic assessment of needs, barriers, goals, timelines and identify trusted interlocutors with whom to partner.

When designating priority markets, CBIE recommends that GAC make a long-term commitment, include a promotional plan and establish sunset provisions. Expanding IE recruitment takes time and the pay-off is often uncertain and invariably long-term. Canada’s cash-strapped education institutions have limited capacity over the short-term to expand their international student recruitment efforts or to redeploy existing resources. In the absence of incentives to support diversification (i.e., a new scholarship program; a TCS-hosted Canadian education event; etc.), a limited number of Canadian institutions will have the bandwidth and financial means to pursue these new opportunities. Smaller ones are likely to continue to focus on maximizing their return on investment in existing markets given the large human and financial resources required to pivot to new markets.

Furthermore, GAC/IRCC readiness and capacity to manage surges in demand for information on study opportunities, financial supports and for processing student visa requests must be in place for selected markets. GAC needs to ensure it can provide prospective international students with timely and appropriate information on Canadian educational and scholarship opportunities, consistent with Canada’s decision to make their source country a “priority”. Equally important, IRCC needs to ensure readiness for processing surges in student visa requests from newly designated “priority” regions and calibrate its officer training program and visa assessment criteria to eliminate the risk of bias.

In 2022, Parliament’s Standing Committee on Citizenship and Immigration investigated high rejection rates among student visa applicants from previous IES designated “priority” countries and regions. CBIE’s brief to the Committee is included as Annex 2. The problems were attributable to several factors: a lack of familiarity among those processing visa applications, with official records, documentation standards and with the educational systems in these countries; the absence of a longstanding relationship between Canadian officials and institutions and education authorities and accredited education agents; applying “one-size-fits-all” financial tests that are unrealistic in low-GDP countries. While things appear to be improving, we need to be vigilant that these types of issues do not compromise Canada’s global brand.

This latter point, on the unintended consequences of applying “one-size-fits-all” approaches, underscores the need for a balanced approach when applying digital solutions to expedite the processing of student visa applications. These solutions must continue to allow for the subjective assessment of student visa requests from students from poorer countries. Low income should not preclude qualified international students from pursuing a Canadian education.

The designation of priority markets must be based on reputable market research about medium to long-term opportunities, including based on demographic projections. Furthermore, defining future opportunities must not only look at the traditional model of international students coming to Canada for a degree or diploma for example, but needs consider the risks associated with brain drain and look at other innovative and inclusive models for expanding global access to education and expanding the reach of Canadian institutions around the world through, for example, transnational education, virtual learning, joint-programming, and other delivery models.

Geographic priorities must take into account the interests of institutions at varying levels (universities, colleges, institutes, polytechnics, cégeps, K-12 school boards and language schools) and encompass opportunities for anglophone, francophone and bilingual institutions. CBIE’s member institutions have focused considerable attention in their diversification efforts in recent years. In considering diversification priorities in the future IES, it is important that GAC recognize that markets designated as “priority” will vary depending on the institutional internationalization objective (i.e. priority market for international student recruitment may not be the same one for outbound student mobility nor for research collaboration, etc.) and the nature of the institution itself (e.g. priority markets for international student recruitment will be different between francophone and anglophone institutions). Canadian institutions have been actively engaged across Africa, Asia, and Latin America and the Caribbean. These regions are of strategic importance to Canada not only from a demographics perspective, but also in terms of strategically supporting Canada’s long-term national trade and foreign policy interests in these parts of the world.

Recommendation 13: When designating priority markets, CBIE recommends that:

- ***GAC pursue ongoing engagement with other federal departments and with stakeholders directly affected by these decisions;***
- ***GAC makes a long-term commitment, includes a promotional plan and establishes sunset provisions;***
- ***GAC/IRCC ensure readiness and capacity to manage surges in demand for information on study opportunities, financial supports and for processing student visa requests for selected markets;***
- ***IRCC ensure that any “digital solutions” it adopts to expedite the processing of student visa applications does not result in inadvertent systematic bias- especially for students from low-income countries or newly designated “priority” countries or regions with which IRCC has more limited experience.***
- ***Selection of markets be based on reputable market research about medium to long-term opportunities, including based on demographic projections and that other innovative models for expanding global access to education and expanding the reach of Canadian institutions around the world beyond traditional student recruitment are included.***

Recommendation 14: In determining diversification priorities in the future IES, it is important that GAC recognize that markets designated as “priority” will vary depending on the institutional internationalization objective and the nature of the institution itself. There is a need for a nuanced approach to diversification within the future IES.

5. Investing in Scholarship Programming

Based on experience, CBIE notes that international scholarship programs, when designed properly and deployed strategically, can be an invaluable tool for advancing Canada’s national interests and international education priorities. This applies to international scholarships for both inbound and outbound students and faculty. Scholarships can also serve as a valuable tool for seeding and expanding the internationalization activities of education institutions.

GAC’s International Scholarships Program (ISP) delivers a suite of scholarship programs of various lengths, focusing on different regions, targeting specific populations all with the intention of advancing a broad range of interests. Other federal departments and agencies, including the IDRC and granting councils, also provide international scholarship programs linked to their mandates, and sectoral or programming imperatives.

For sure, it makes sense for Canada to maintain a range of scholarship programs that can accommodate the diverse needs of prospective international students, the human and developmental capacity requirements of recipient countries, Canada’s international and domestic interests and the internationalization objectives of Canadian education institutions. CBIE supports the expansion of international scholarship programming. But for qualified international students trying to determine their eligibility for scholarship support, navigating this suite of scholarship programs can be challenging.

Smaller and medium-sized educational institutions often have limited means to grow their institution’s international engagement. They rely heavily on institutional faculty to forge and grow their international partnerships and connections. Faculty initiatives help to catalyze much of the internationalization programming for these institutions. As such, it would be beneficial for the continued growth and diversification of the Canadian international education sector for the Government of Canada to invest in more scholarship opportunities for faculty mobility and further to invest in more scholarship opportunities that broadly support research collaboration.

One of the legacies of the COVID-19 pandemic for international education has been the rapid acceleration of virtual learning, knowledge exchange and online research collaboration. Sometimes through deliberate strategy - but more often by necessity - Canadian institutions moved quickly to adapt their teaching modalities, faculty exchange programs, curriculum design, evaluation processes and accreditation protocols to this unprecedented event. Their efforts were largely successful. GAC’s ISP needs to adapt to these COVID-19 driven changes by extending scholarship eligibility to include virtual and hybrid learning, virtual research collaboration and faculty exchanges.

A Focal Point for Scholarship Information

CBIE strongly supports the creation of a single window and focal point of accountability for administering federally supported international scholarship programming. This would provide the necessary critical mass for developing an AI supported, easy to navigate, query-based search function for prospective international students and faculty, Canadian institutions, and Canada's Trade Commissioner Service. Thoughtfully designed, this virtual focal point could:

- Provide a foundation for advancing a consistent and coherent Canadian international scholarship brand
- Enable users to enter their profiles to:
 - quickly and efficiently identify appropriate scholarship programs/sources of support
 - automatically direct applicants to scholarships for which they are eligible
 - use supportive AI to allow candidates to apply once for all relevant forms of assistance
 - limit stacking, where multiple scholarships are awarded to same candidate
- Establish a data base of scholarship applicants/recipients to facilitate:
 - program evaluation (application process, results, and outcomes)
 - EduCanada marketing/promotion
 - ongoing engagement with scholarship recipients (long-term impacts)
- Track the geographic distribution of scholarship applications and applicant success from overseas sources
- Monitor the geographic distribution of scholarship awards domestically- by program of study, jurisdiction, and institution
- Be designed to be scalable and accommodate information on international scholarship opportunities from:
 - other federal departments and agencies
 - universities, colleges, training institutions and language schools
 - private sector/foundations
 - PT programs

Scholarship Branding

GAC's discussion paper also acknowledges the need for a more accessible and coherent narrative to describe GAC's suite of scholarship programs. It also notes that the component programs were created at different points in time in response to specific policy and programming imperatives and may need to be refreshed. CBIE concurs fully with this assessment and supports the creation of a distinct and cohesive Canadian international scholarship "brand".

Based on a review of the stated purpose of the scholarship programs GAC ISP delivers, and the more aspirational language in the GAC discussion document, CBIE believes that a critical first step towards bringing some coherence to this suite of programs should be to develop a new conceptual model or framework for international scholarship programming. This framework should provide for a simpler and more intuitive framing of the intent, objectives and value-added federally supported scholarship programs seek to provide and be region and country neutral. Potential themes could include:

- **Developmental Scholarships:** build human, technical and leadership capacity in priority countries that: supports sustainable growth; improves health outcomes; strengthens governance, democracy and the rule of law; and advances social stability and gender equality
- **Humanitarian Scholarships:** support continuity of learning for students in/from crisis regions and deliver responsive training that can alleviate immediate suffering and support recovery
- **Academic Scholarships:** incent high-achieving students to enroll in Canadian institutions and support faculty exchanges in designated fields
- **Northern & Indigenous Scholarships:** support outbound mobility for indigenous students, cross-cultural learning, and collaborative research on circumpolar issues
- **Research & Innovation Scholarships:** facilitate face-to-face and virtual staff, student and faculty exchange and collaborative research in emerging and innovative sectors
- **Foundational Scholarships:** support K-12 teacher exchange programs focused on cross-cultural learning and language training

Ideally, these scholarships would be scalable- both in terms of their size and duration- based on the country, sector, or target population.

Scholarship Evaluation and Engaging Scholarship Alumni

It is also essential that GAC's international scholarship programs incorporate comprehensive evaluation criteria that includes provision for the longitudinal tracking of scholarship recipients. Understanding whether their Canadian scholarship helped to advance their career and soliciting their views on how to improve scholarship programming, would have considerable value. Requirements for maintaining ongoing connections with scholarship recipients should also be built into scholarship programs. On that point, CBIE notes that engaging alumni more effectively is part of the unfinished business from the last iteration of Canada's International Education Strategy.

CBIE believes that Canada's trade commissioners and GAC's broader diplomatic missions should acknowledge scholarship alumni as an elite cadre of individuals who know and understand Canada and are predisposed to help. They should be able to convene regular "Connecting with Canada" meetings with them for counsel, networking support or soliciting their participation as de facto ambassadors for Canadian international education.

Recommendation 15: CBIE supports expanded international scholarship programming for both inbound and outbound mobility and acknowledges the value of maintaining a range of programs designed to meet specific needs and target populations.

Recommendation 16: Faculty mobility programs should be expanded as part of the growing suite of international scholarships funded by the Government of Canada.

Recommendation 17: Scholarships supporting research collaboration should be expanded as part of the growing suite of international scholarships funded by the Government of Canada.

Recommendation 18: Eligibility for GAC and other federal international scholarship programming should include virtual and hybrid learning, virtual research collaboration and faculty exchanges.

Recommendation 19: CBIE strongly supports the creation of a single window and focal point of accountability for administering federally supported international scholarship programming. This would provide the necessary critical mass for developing an AI supported, easy to navigate, query-based search function for prospective international students and faculty, Canadian institutions, and Canada's Trade Commissioner Service.

Recommendation 20: CBIE supports the creation of a distinct and cohesive Canadian international scholarship "brand". CBIE supports adopting a new conceptual model for Canada's current suite of international scholarships that will be simpler to explain, easier to navigate and provide a foundation for a more distinct global Canadian scholarship brand.

Recommendation 21: Canada's suite of scholarship programs should incorporate comprehensive evaluation criteria, make provision for the longitudinal tracking of scholarship recipients, and incorporate requirements for maintaining ongoing connections with scholarship recipients.

Recommendation 22: Canada's trade commissioners and GAC's broader diplomatic missions should acknowledge scholarship alumni and convene regular "Connecting with Canada" meetings with them for counsel, networking support or to solicit their participation in activities promoting Canadian international education.

6. Securing a long-term strategy for outbound student mobility

CBIE strongly believes that incoming students, along with Canadians studying, teaching, or participating in collaborative research abroad, spark new ideas and increase Canada's innovation capacity. By allowing individuals to develop their global skill and competencies, these people-to-people ties advance Canada's trade diversification goals and strengthen Canada's connections and international networks.

Reciprocity matters: while Canada presently hosts over 800,000 international students, the proportion of Canadians studying overseas is infinitesimally smaller. We need to rebalance that ratio so that more Canadians benefit from the experience of learning abroad.

Despite the very challenging context created by the Covid-19 global pandemic, the Global Skills Opportunity pilot program as part of the 2019-2024 IES, has made good progress to date in enabling international experiences for some 4000+ students so far. The enormous impacts and benefits for the students involved are already becoming clear. The importance of increasing the participation of Canadians in international learning opportunities - especially students with disabilities, Indigenous

students and those from low socio-economic backgrounds who have traditionally faced barriers to participation – must remain a long-term priority. Canada needs workers with the global knowledge, experience and networks gained from international study and work experiences to foster long-term prosperity in an innovative knowledge economy.

CBIE believes the next IES should provide a stronger focus on increasing the number of outbound students and better realising their potential for-Canada benefit, via:

- a scaling up of the current outbound mobility pilot to a full-fledged long-term outbound mobility program – including an ongoing focus on underrepresented students;
- a concerted effort to connect Canadian youth learning abroad more directly with Canadian businesses supported by the TCS;
- better marketed GOC/business sponsorships for work integrated learning; and
- fostering a culture of outbound learning beginning with the K-12 sector.

The K-12 sector is an area of unrealized potential. The earlier we can encourage young students to be globally minded and acquire the skills to successfully navigate, network, and negotiate with their peers around the world, the more they and Canada can benefit. Study abroad (even short-term) can have tremendous life-changing consequences. Given how pivotal these experiences are – particularly to students who never considered that they had the aptitude, means or reasons to pursue learning abroad, it is all the more important to connect with students at an earlier stage in their journey. By offering international experiences to students in the K-12 age group, we can expand their horizons earlier and open them to pathways that they might not consider otherwise – be it pursuing post-secondary education at all - or choosing from a wider array of career options. We need to reach these students before they lock themselves into particular education and/or career pathways based on perceptions of what opportunities are available to them as a result of family/community context, financial constraints and potentially limited views of their own skills and aptitudes. CBIE therefore recommends that eligibility for the Global Skills Opportunity program be extended below the post-secondary level to facilitate opportunities and experiences for students at the K-12 level.

Recommendation 23: The Global Skills Opportunity pilot program should be scaled up and turned into a full-fledged long-term outbound mobility program with an ongoing focus on underrepresented students and fostering further work-integrated learning opportunities abroad through Canada's TCS.

Recommendation 24: The next IES should acknowledge the unrealized IE potential of Canada's K-12 sector and extend eligibility for the Global Skills Opportunity program to facilitate opportunities and experiences for students at the K-12 level.

7. Creating a robust approach to international education data

The inability of Canada's IE partners and stakeholders to reach consensus on how to assemble, maintain and share timely, relevant, and standardized IE data remains one of the limiting factors in developing comprehensive and effective IE policies and programs at the federal, provincial, territorial, municipal, and institutional levels.

The problem is not a new one; while Canada's IE community has long acknowledged the need for better data and evidence to inform decisions, progress towards bridging knowledge gaps continues to be slow and uneven. CBIE recognizes that the sector is a highly competitive one and that issues of jurisdiction, data ownership, stewardship, privacy, and access can be challenging to reconcile. However, as IE is gaining wider recognition as an increasingly important ingredient in advancing Canada's national interests at home and overseas, the urgency for progress has never been higher.

Accordingly, CBIE believes that a new IES should also strive to make headway in bridging long-standing data gaps that limit Canada's ability to fully leverage the potential of its IE sector. This too requires a whole of government approach and expanded collaboration. Ideally, the theme of bridging IE data gaps could serve as the focus for the inaugural meeting of the proposed biennial Pan-Canadian IE Planning Summit referenced above.

The current approach to date, making progress incrementally, is putting the sector at risk. A concerted effort is required to gather more complete, timely, relevant, and standardized data in three domains:

- First: IE recruitment objectives and results by institution; priority country/region; program of study, so that:
 - IRCC can calibrate its resources based on forecast demand for study/work permits
 - Host communities can anticipate support requirements (i.e., housing, education, health)
 - Social service providers/ethnocultural communities can plan support (i.e., childcare, mental health)
 - Economic development officers and businesses can better anticipate labour market supply, needs and development opportunities
 - Sectors deemed "priority/strategic" can set recruitment priorities (i.e., forecast needs, identify research opportunities, offer work assignments)
 - GAC's Trade Commissioner Services can best leverage its resources
- Second: experiences inbound students encounter, to inform policy/program needs:
 - Pre-arrival: why they chose Canada; experience with recruitment/screening process; timeliness/ease of accessing study/work permits; arriving with family/spouse)
 - Arrival: adequacy of reception/support (institutional/community); accessing housing, education, and health services; financial/banking support)
 - Stay: readiness to complete academic program of study; access to academic counsel/support; overall ease of integration; experience with discrimination, safety, or security; success finding/retaining work, including apprenticeships; overall success
 - Post-graduation: success finding work in their field of study; whether pathway to immigration achieved; likelihood of recommending Canada/institution of study to peers; longitudinal data on their subsequent/continued engagement with Canada)
- Third: experiences of outbound students and the for-Canada benefits this provides:
 - Motivation for outbound experience
 - Number of Canadians learning abroad (by country/program of study/institution)

- How studying abroad affected post-academic learning/professional experience (based on country/program of study)
- Longitudinal assessment of the for-Canada impacts on studying overseas

Recommendation 25: The new IES should include support for bridging long-standing data gaps that have limited Canada's ability to fully leverage the potential of its IE sector. A concerted effort is required to gather more complete, timely, relevant, and standardized IE data in three domains:

- ***IE recruitment objectives and results by institution, priority country/region and program of study***
- ***Experiences inbound students encounter to inform policy/program needs***
- ***Experiences of outbound students and the for-Canada benefits this provides***

Summary of Recommendations:

1. The next IES needs to acknowledge the full breadth, scope and potential of Canada's IE sector, and comprise a whole-of-government and sector-wide strategy to ensure Canada is taking a more expansive and strategic approach to international education through engagement of a broader range of federal departments, agencies and institutions in its execution.
2. The next IES must ensure Canada is delivering the true value of what is sold to students under the Edu-Canada brand. The strategy must advocate for and advance efforts to provide effective support to international students from the time they apply to study with a Canadian institution, through to post-graduation and transition to work.
3. Policymakers need to better acknowledge the myriad for-Canada benefits of IE and provide it the same level of focused, strategic attention and support as other priority growth sectors.
4. CBIE recommends that the IES include funding to support more regular structured dialogue to convene the sector on issues of importance in the form of a biennial pan-Canadian IE Summit that brings together representatives from all levels of government, educational institutions, industry, labour and professional and community associations, to identify and address issues of mutual interest and concern with respect to Canada's IE programming. Furthermore, through these dialogues, a series of pilot projects could be created to test innovative approaches for addressing issues the sector is facing which could later be scaled up.
5. GAC should embrace a broader vision and framework for IE, make advancing IE a key consideration across the department beyond the TCS, develop relevant performance assessment criteria and work with Canada's IE sector to provide specialized training on how to advance Canada's IE interests as well as country-specific orientation on IE opportunities.
6. The Edu-Canada Brand should incorporate a commitment to ethical IE and more clearly articulate the imperative for Designated Learning Institutions to demonstrate their commitment to and capacity for delivering values-driven IE programming. The CBIE Code of Ethical Practice for International Education in Canada and companion Code of Conduct for Working with International Education Agents currently under development could be expanded beyond CBIE membership and used by GAC and CMEC as part of the Edu-Canada brand requirements.
7. GAC should leverage its Edu-Canada brand marketing channels and resources to educate prospective international students on the appropriate ways for them to seek immigration-related advice in the submission of their study permits to Canada.
8. Canada needs to take a global leadership role in developing a more ethical approach to international education to ensure that it is inclusive, positive, and sustainable for all involved. This includes ensuring that existing marketing, policies and programming do not serve to perpetuate inequalities or colonial approaches. Future programming must actively encourage further participation and support for underrepresented groups such as through dedicated scholarships and opportunities through the Global Skills Opportunity program.

9. CBIE encourages GAC to not only track and report on the economic impacts of IE, but also on the overall environmental impacts of the sector- at home and globally.

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

11. 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.

12. International students should form a special stream within our immigration system, wherein their study permit applications are not rejected for indicating that they want to remain in Canada after graduation. Furthermore, pilot programs should be created which focus on the labour market needs of particular regions or sectors in Canada. Such programs would allow for the streamlining of international students into specific programs of study, through the PR process and directly into jobs to fill identified labour market gaps.

13. When designating priority markets, CBIE recommends that:

- GAC pursue ongoing engagement with other federal departments and with stakeholders directly affected by these decisions;
- GAC makes a long-term commitment, includes a promotional plan and establishes sunset provisions;
- GAC/IRCC ensure readiness and capacity to manage surges in demand for information on study opportunities, financial supports and for processing student visa requests for selected markets;
- IRCC ensure that any “digital solutions” it adopts to expedite the processing of student visa applications does not result in inadvertent systematic bias- especially for students from low-income countries or newly designated “priority” countries or regions with which IRCC has more limited experience.
- Selection of markets be based on reputable market research about medium to long-term opportunities, including based on demographic projections and that other innovative models for expanding global access to education and expanding the reach of Canadian institutions around the world beyond traditional student recruitment are included.

14. In determining diversification priorities in the future IES, it is important that GAC recognize that markets designated as “priority” will vary depending on the institutional internationalization objective and the nature of the institution itself. There is a need for a nuanced approach to diversification within the future IES.

15. CBIE supports expanded international scholarship programming for both inbound and outbound mobility and acknowledges the value of maintaining a range of programs designed to meet the specific needs and target populations.

16. Faculty mobility programs should be expanded as part of the growing suite of international scholarships funded by the Government of Canada.
17. Scholarships supporting research collaboration should be expanded as part of the growing suite of international scholarships funded by the Government of Canada.
18. Eligibility for GAC and other federal international scholarship programming should include virtual and hybrid learning, virtual research collaboration and faculty exchanges.
19. CBIE strongly supports the creation of a single window and focal point of accountability for administering federally supported international scholarship programming. This would provide the necessary critical mass for developing an AI supported, easy to navigate, query-based search function for prospective international students and faculty, Canadian institutions, and Canada's Trade Commissioner Service.
20. CBIE supports the creation of a distinct and cohesive Canadian international scholarship "brand". CBIE supports adopting a new conceptual model for Canada's current suite of international scholarships that will be simpler to explain, easier to navigate and provide a foundation for a more distinct global Canadian scholarship brand.
21. Canada's suite of scholarship programs should incorporate comprehensive evaluation criteria, make provision for the longitudinal tracking of scholarship recipients, and incorporate requirements for maintaining ongoing connections with scholarship recipients.
22. Canada's trade commissioners and GAC's broader diplomatic missions should acknowledge scholarship alumni and convene regular "Connecting with Canada" meetings with them for counsel, networking support or to solicit their participation in activities promoting Canadian international education.
23. The Global Skills Opportunity pilot program should be scaled up and turned into a full-fledged long-term outbound mobility program with an ongoing focus on underrepresented students and fostering further work-integrated learning opportunities abroad through Canada's TCS.
24. The next IES should acknowledge the unrealized IE potential of Canada's K-12 sector and extend eligibility for the Global Skills Opportunity program to facilitate opportunities and experiences for students at the K-12 level.
25. The new IES should include support for bridging long-standing data gaps that have limited Canada's ability to fully leverage the potential of its IE sector. A concerted effort is required to gather more complete, timely, relevant, and standardized IE data in three domains:
 - IE recruitment objectives and results by institution, priority country/region and program of study
 - Experiences inbound students encounter to inform policy/program needs
 - Experiences of outbound students and the for-Canada benefits this provides

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Annex 1

CBIE's brief to IRCC's consultations on *An Immigration System for Canada's Future*

Annex 2

CBIE's 2022 brief to the Standing Committee on Citizenship and Immigration on high rejection rates for student visa applicants from North and sub-Saharan Africa



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.

50+
years of
experience

135+
member
institutions

40,000
scholars
mobilized

\$2.5
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



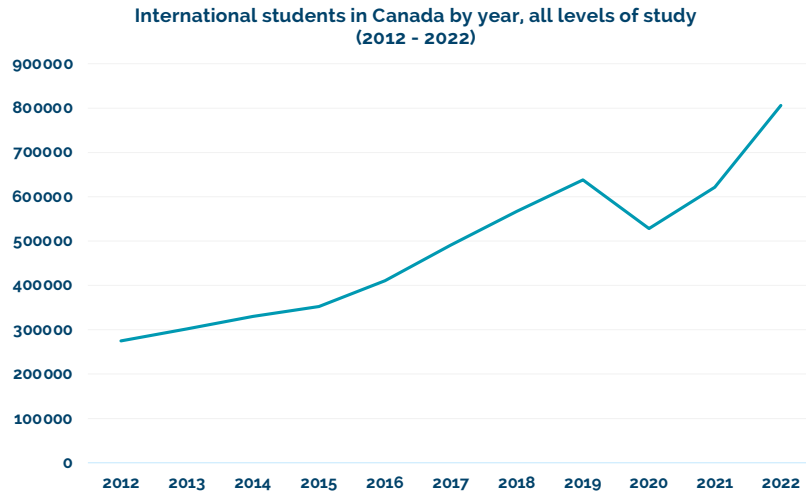
Source: Project Atlas/IIIE

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



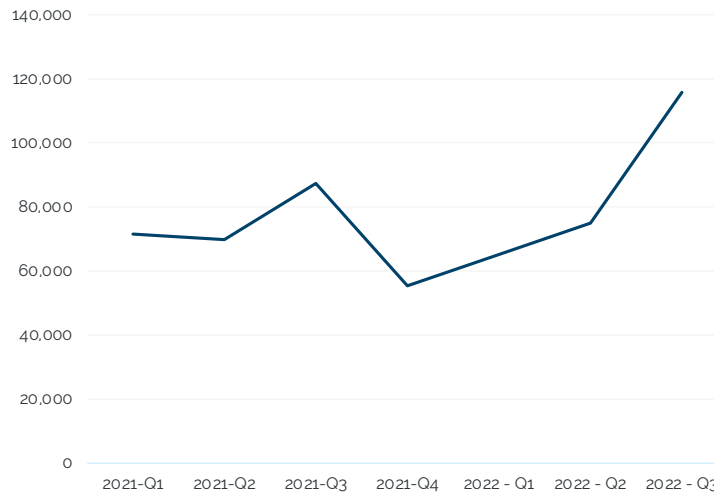
Number of Study Permit Applications (excluding Extensions) Approved and Refused 2019 – 2022*



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



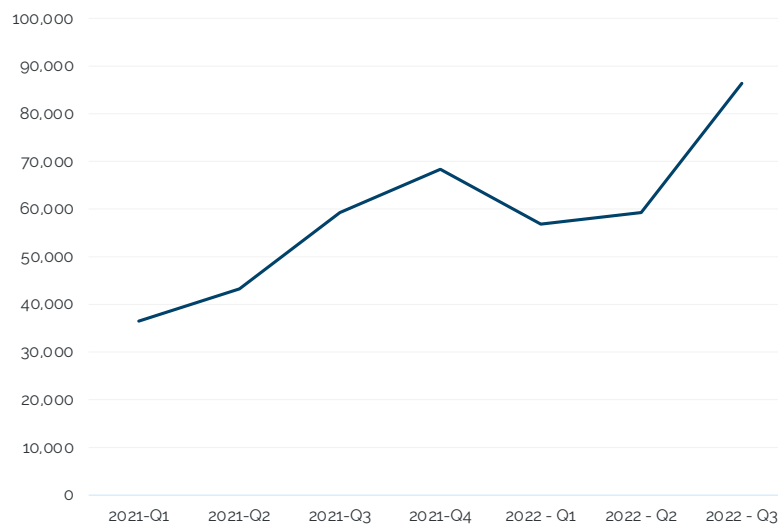
Study Permit Application Approvals (Q1 2021 – Q3 2022)



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.

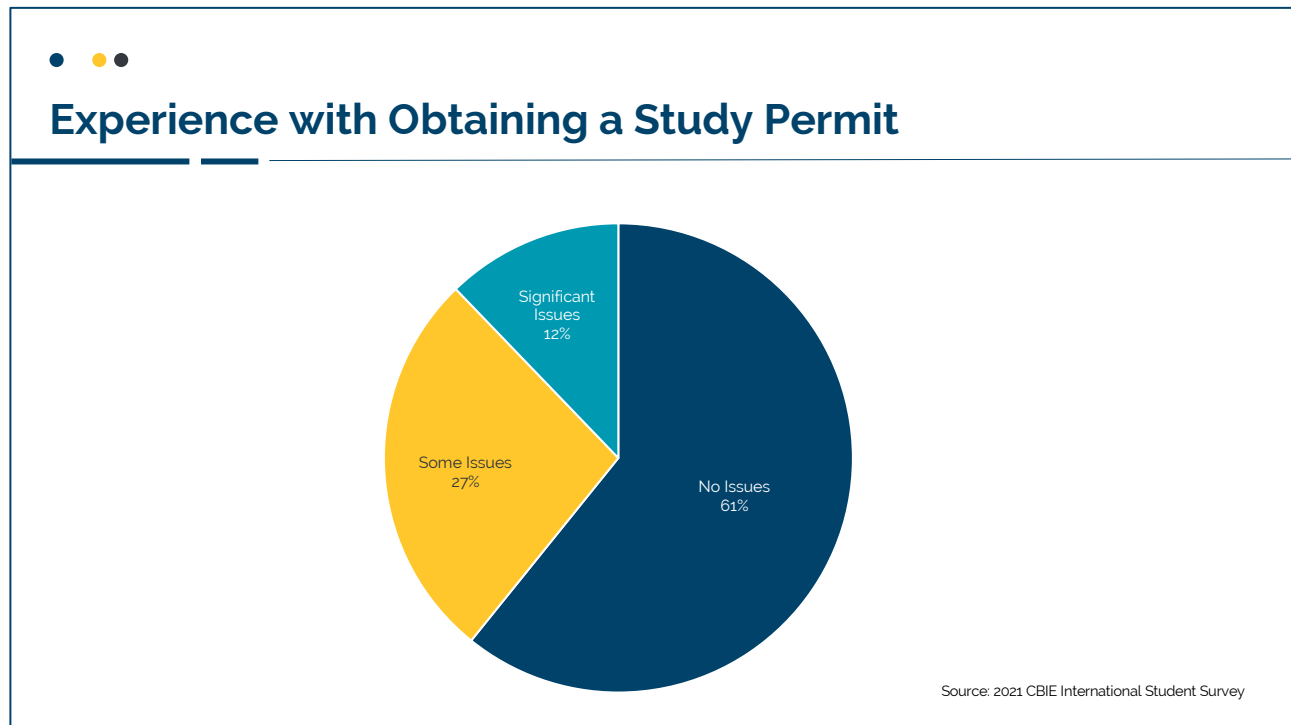


CBIE’s Immigration Advisory Committee (IAC)



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.*

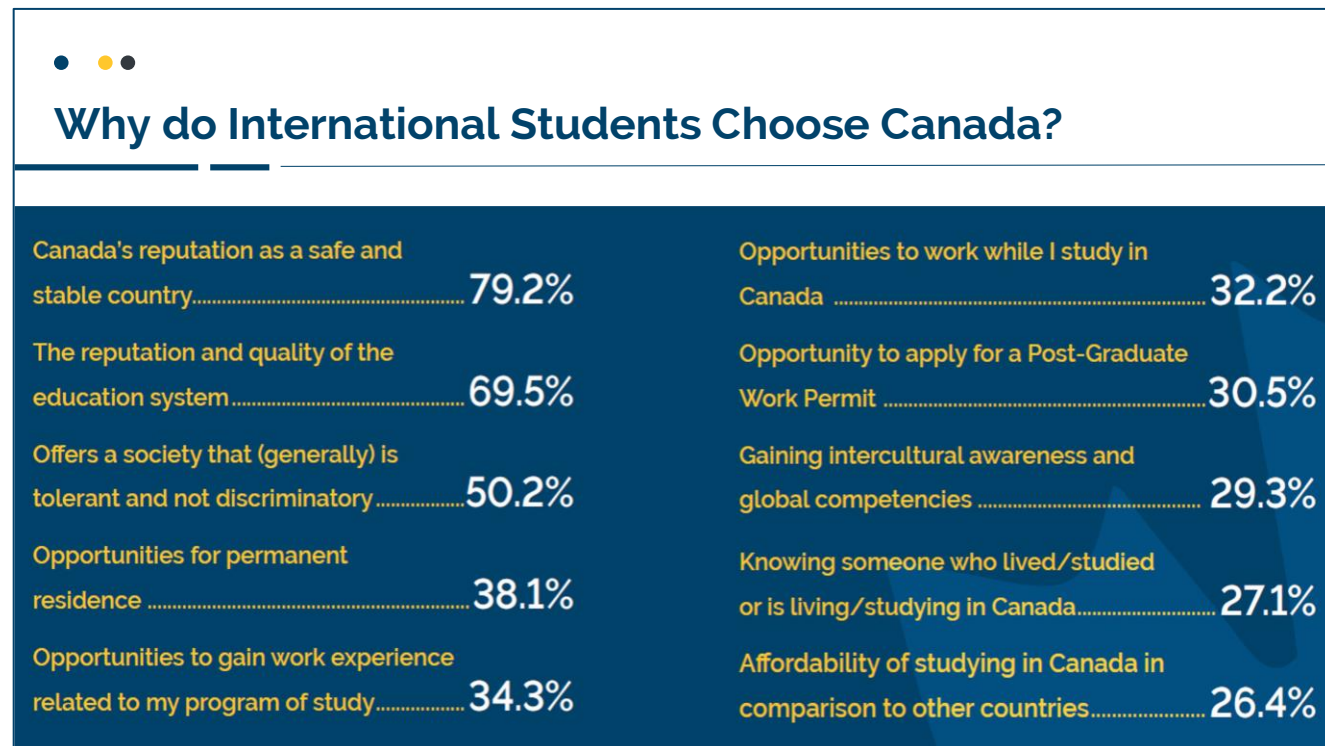
6. *Canada's immigration policies and international education policies must remain complementary and continue to reflect core Canadian values of inclusion, tolerance, fairness, generosity and international solidarity.*
7. *The resources available to IRCC to enable the timely processing of international 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:

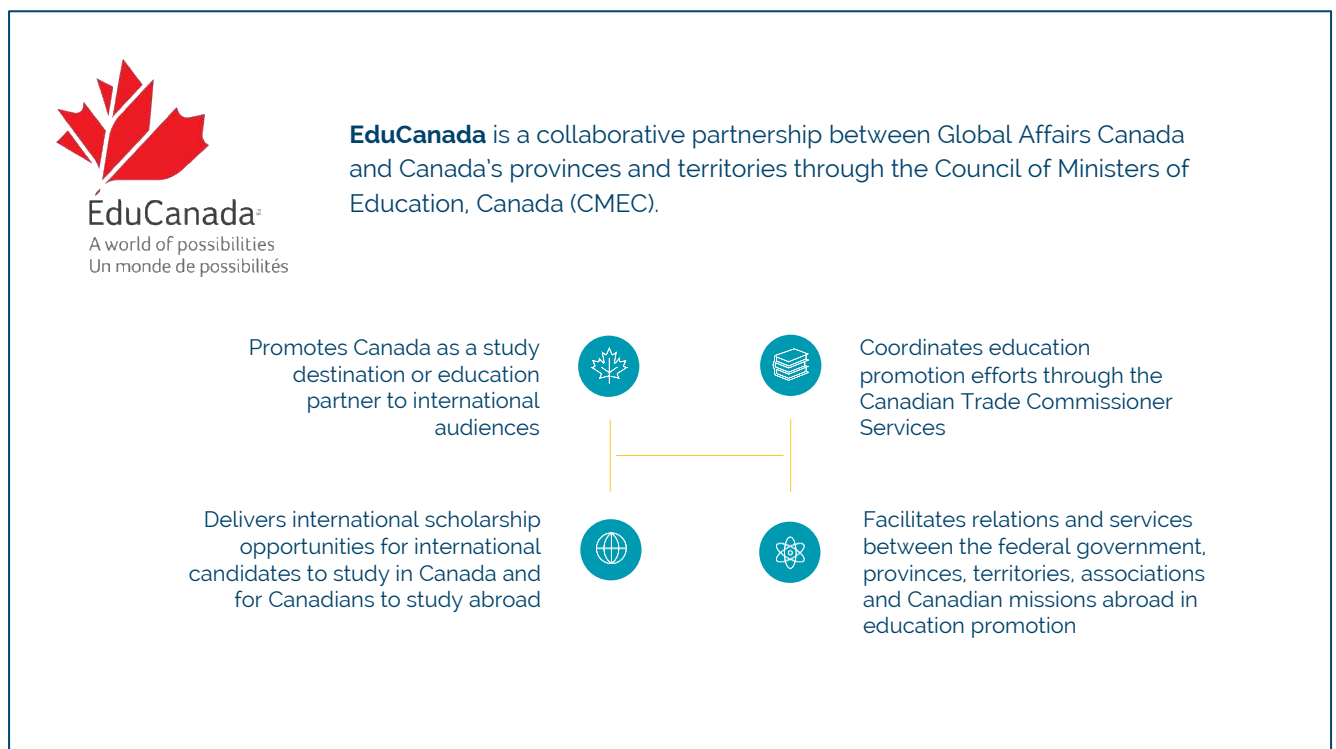
- address the longstanding data gaps that make it difficult for FPT governments, educational institutions, businesses, municipalities, and community service providers to plan for and assess the ongoing impacts of international enrollment on housing, social and other services;
- clearly delineate the 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.

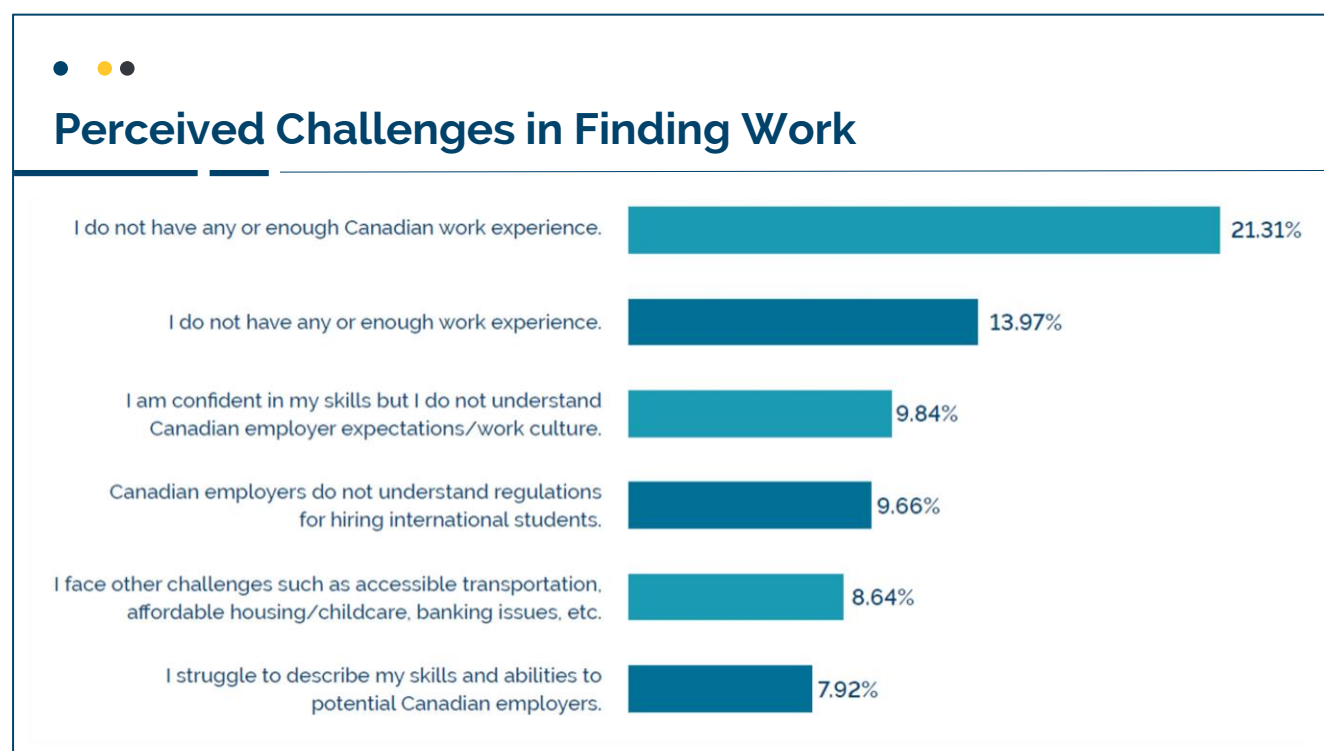
In a similar vein, enabling international students who need to work in Canada to support their studies is also an expression of Canadian values of equity and fairness. For many international students, the ability to work on a part-time basis—to pay-as-you-go—is critical to their decision (and ability) 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.

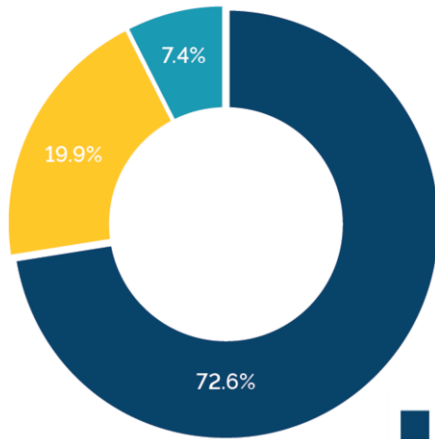


CBIE also notes that absent a deliberate strategy that encourages and supports smaller regions and communities to attract and retain international students, the stated demographic goals for Canada's immigration strategy are unlikely to be fully realised. While most immigrants opt to settle in larger 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.

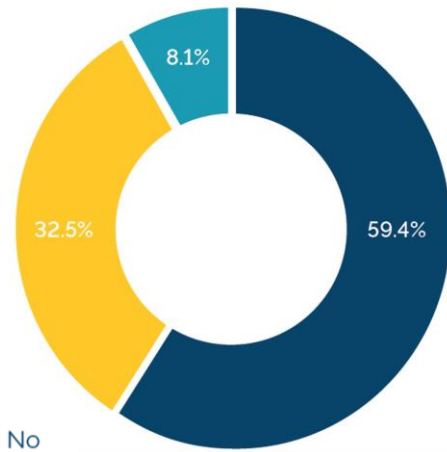


Intentions to Stay in Canada

Plans to Apply for Post-Graduate Work Permit



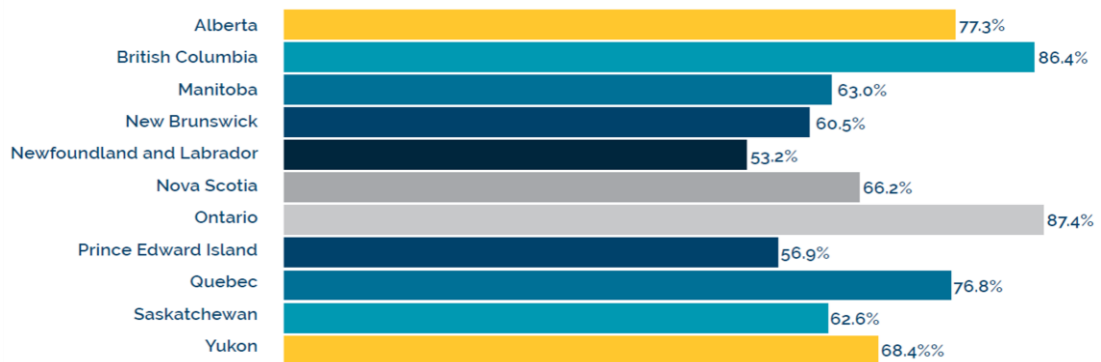
Plans to Apply for Permanent Resident Status in Canada



■ Yes ■ Unsure ■ No



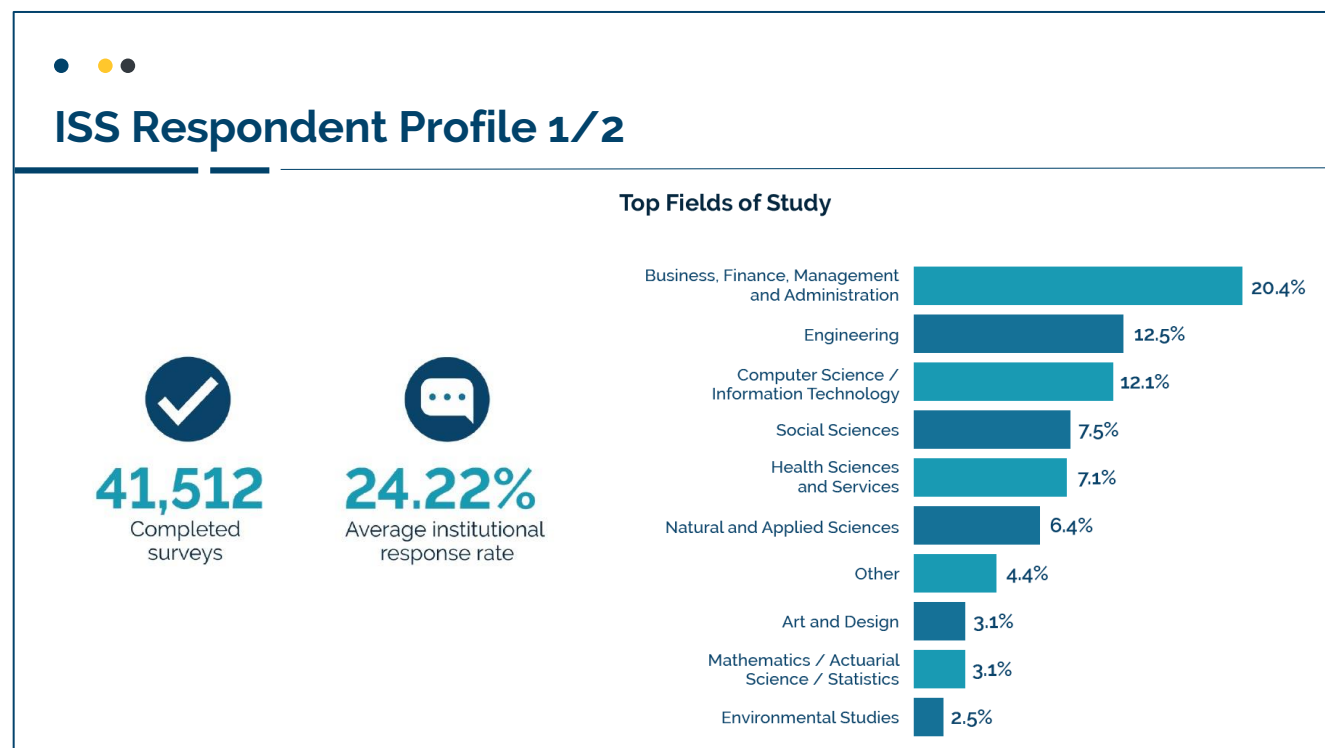
Students Who Currently Live in the Province/Territory Who Intend to Stay After Receiving Permanent Resident Status



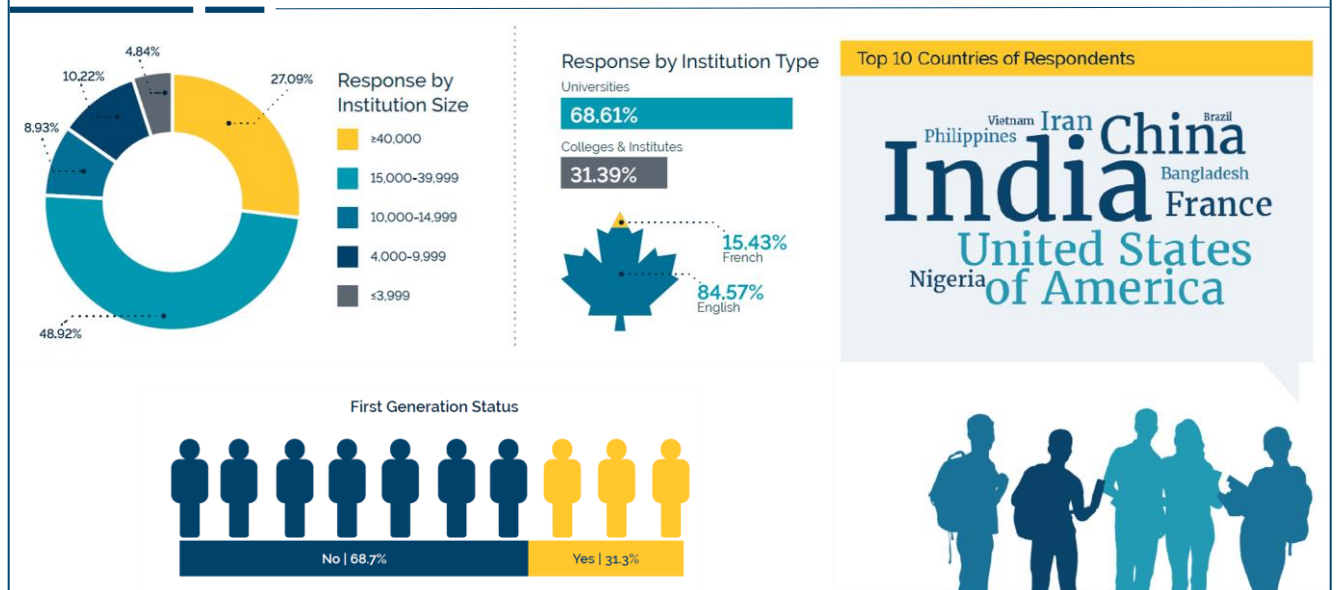
When asked why they would like to live in the selected province, 33.1% of respondents noted that they enjoy the lifestyle of the province, while 25.3% are concerned with employment opportunities, and 20.6% want to be close to family or friends.

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.

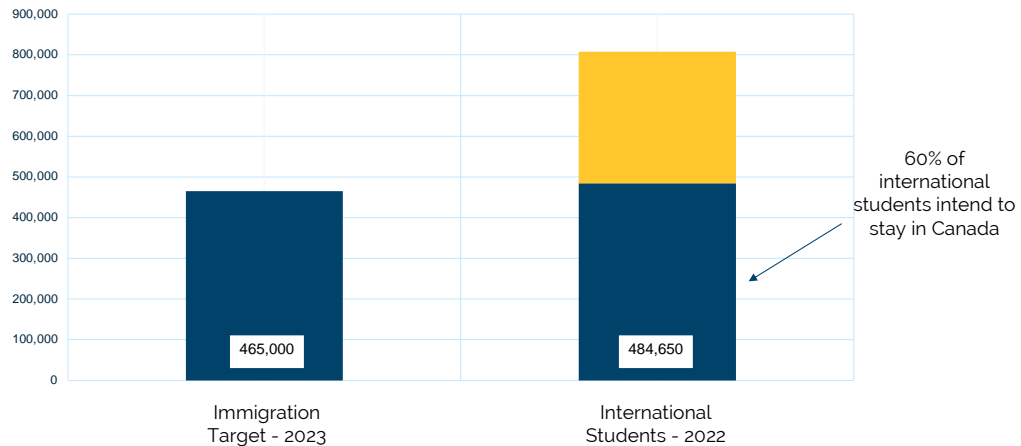
But that is only part of the equation. International students also add value to our institutions and communities in many other ways. Through their energy, ingenuity and creativity. By providing additional breadth of perspective and insight when tackling complex challenges. By exposing us to different 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.*

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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.



Canadian Bureau for
International Education
Bureau canadien de
l'éducation internationale

Speaking Notes for Larissa Bezo
President and Chief Executive Officer, Canadian Bureau for International Education
HOC Standing Committee on Citizenship and Immigration
February 1, 2022

CHECK AGAINST DELIVERY

I am joining you this morning from Ottawa, traditional and unceded territory of the Algonquin Anishinaabeg.

Let me begin by thanking the Committee for providing the Canadian Bureau for International Education (CBIE) the opportunity to contribute to these important deliberations.

Our 150+ member institutions reflect the full spectrum of Canada's international education (IE) community, from universities, colleges, institutes, polytechnics and CEGEPs to school boards and language schools and represent over 1.9M students from coast to coast to coast.

We are immensely proud of Canada's status as *the* destination of choice for international students. And we are acutely aware of the need to protect, maintain and wherever possible, to enhance Canada's standing in a fiercely competitive global market.

Accordingly, we commend the Committee's interest in shedding light on how student visa applications are processed, including why rejection rates differ across Canadian visa offices and how we can do better at each stage of the student recruitment and intake process to keep these rejection rates as low as possible...

Because 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... Each rejection 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 and to advance Canada's future prosperity.

The problem is growing; Canada's rejection rate for student visa applications has increased in recent years. And, it is especially concerning in specific country and regional contexts- Africa, and Francophone Africa, in particular.

We need to be mindful that these failures of process do not end up being interpreted by potential international student candidates as failures of respect. The reputational risks for the “Canada-brand” are significant.

To be sure, Canada’s IE sector has seen exponential growth over the past five years, increasing by some 135% since 2009. This has occurred against the backdrop of an increasingly ambitious immigration program, a sharp rise in demand for refugee settlement services and the COVID-19 pandemic.

To cope, IRCC has had to change gears and increase their reliance on online application systems and algorithms to help process applications.

Unfortunately, student visa rejection rates have increased in lockstep with this growth- from 31% in 2016 to 53% in 2020.

The growing disconnect between the policy ambition and processing capacity is hard to ignore...

While it is important to pay attention to rejection rates for student admissions, we strongly encourage the Committee to consider the interconnectedness of this problem with wider issues of policy coherence and integration across Canada’s IE sector.

Three Issues

There are three things I want to touch on briefly in my remarks before shifting focus to some potential solutions. **First, what we are hearing** on the ground and at the community level from our members. **Second** the need to make headway on the issue of **dual intent**. **And third**, closely related to dual intent- **the need for a more coherent, integrated and sustainable pan-Canadian approach to IE**.

I will be pleased to elaborate on any of these points in the discussion; these are very dense, complex and nuanced policy issues that need to be unpacked.

What we are hearing from our institutions—and what CBIE itself has observed as administrator of a number of international scholarship programs—is that there are some troubling disconnects in the current system.

We are aware that many well-qualified students have had their permit applications rejected. Over half a million rejections since 2016.

And we are aware that student study permit approval rates in some Canadian visa processing centres overseas have been and remain extremely low- despite official policy direction that Canada diversify its source countries for international students...

Discretion is clearly being exercised- as it should be given Canada’s legitimate national interest concerns, the imperative to protect our domestic security and safety and to select students who have the best chance of succeeding. But where and how this discretion is being exercised is often opaque.

At a minimum, we need to ensure some level of consistency across visa centres for how applications are being processed and assessed, so that we can test and validate that where discretion is being applied, it is being done fairly and in a way that reflects Canadian values and Government of Canada priorities.

With regard to dual intent, we encourage the Committee to take a strong position on this issue...

Dual intent is a simple concept that acknowledges the reality that many international students might want to both complete their study programs in Canada and then remain here to live and work.

It lets them declare upfront their plans to do so... without creating the perverse incentives our current system has for them to misrepresent their intentions.

Indeed, if it is the stated policy of the government of Canada to address our demographic deficit through immigration and to attract the best and brightest young immigrants to Canada...

If ESDC is reporting that we are facing severe skill-shortages in critical growth sectors...

If our businesses are telling us they need to recruit and grow new talent to be competitive globally...

If the viability of our research institutions, knowledge industries and key sectors depend on an influx of global talent...

And if Global Affairs Canada is actively and aggressively promoting Canada's world-class educational institutions and Canada as a destination of choice for young talent

Then why not create a program that formally acknowledges and encourages precisely this type of candidate?

Now I want to stress here that not all international students who apply to Canadian institutions plan to remain here after completing their studies. Nor is this a desirable outcome for Canada or for the source countries.

Yes, we need to recruit talent to Canada. But this should not be by poaching talent from vulnerable or less resilient countries who desperately need to preserve and grow their human capital. There are other strategies we can deploy to draw on the expertise of international students who previously studied in Canada and have returned home.

Indeed, we would not want to see any changes to current student visa processes that penalize students who plan to return home after graduation.

That is why **dual intent is also part of the imperative for a more integrated and sustainable federal approach to international student recruitment.**

As it currently stands, we have a siloed approach to policy development in this space. We need to connect-the-dots and be more coherent.

Being more upfront about our intentions will better inform how we screen student visa applicants:

- We need ESDC to engage more effectively with provinces and territories, industry, and community service organizations to identify labour market priorities that inform student recruitment policies. (If we really want to have an impact across our communities, we need to see better alignment of labour-market needs with IRCC's immigration goals and visa-processing approaches);
- We need GAC to more clearly articulate Canada's geopolitical interests in the context of IE so we can take advantage of the "soft-power" and the connections and networks successful IE programs can provide; and
- As we move ahead, we need IRCC to take some practical steps to:
 - improve its training, 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.

In looking beyond the initial step of studying in Canada, there is tremendous potential for our host institutions and settlement service agencies to adopt a more holistic approach to supporting international students who have declared their intention to stay in Canada after completing their programs.

There is also an ongoing role for institutions to facilitate this transition, to ensure their graduates have continued access support services, as well as other career and community transition supports post-graduation. Some of our institutions and communities are showing commendable leadership in these areas by championing innovative and seamless approaches to labour market and community integration for international students.

Scoping Solutions

As it is early days for the Committee, our hope is that the Committee will be able to explore and advocate for new pilot programs that can be scaled-up, if successful.

In particular, we would like to see the benefits and risks of a implementing an entirely new pathway for international students explored for those who want to both study in Canada and eventually stay after graduation. This would be a strong starting point.

Simply tweaking the current “temporary visitor visa” framework will not be enough. We need some bold, innovative thinking here which complements our immigration goals—something that makes a strong statement that it is not “business as usual” in Canada. CBIE members are keen to engage on this issue.

In closing, I want to note that CBIE is supporting our member organizations to do their part to help reduce student visa rejection rates.

We are doing so by delivering training programs, hosting fora for IE administrators and practitioners to improve recruitment processes, and supporting the implementation of *EduCanada* programming and other domestic and sector-driven international student recruiting efforts. Indeed, it is crucial that potential candidates have realistic expectations about what is required to successfully complete a program of study in Canada.

And I know the Committee will also be interested to learn that CBIE’s most recent international student survey in December elicited responses from 40,000+ international students studying in Canada.

The survey included specific questions about their experiences with recruitment.

Over 70% of survey respondents indicated they would apply for a post-graduate work permit following their studies, while just under 60% said they intended to apply for Permanent Resident Status in Canada.

Final results from the survey will be available soon and I will work with the Committee Clerk and Chair to ensure Committee members have access to relevant findings.

The survey will be a critical tool in identifying emerging issues affecting international students and in helping inform policies and programs to preserve Canada’s status as *the* destination of choice for international students.

As is our norm, CBIE and our members will be engaging to discuss results, identify needs and set priorities for action in support of Canada’s international students.

Thank you. I am happy to take questions...