

Reimagining Immigration: The Canadian International Workforce Program

Canada's workforce imperative and the need for a permanent, low-skilled immigration program

August 2025

Introduction

There is a demographic imperative for sustainable, demand-driven immigration in Canada. With birth rates well below replacement levels and a shrinking domestic labour pool, Canada must rely on a robust, sustainable immigration system to bridge the gap and ensure prolonged economic growth. Our current immigration system is not up to this task with complex rules and rigidities, and significant processing delays. Public trust in immigration has been eroded, with subsequent cuts to immigration levels. The 2025 Speech from the Throne reiterated the importance of immigration in Canada and the need to reevaluate our current system: "Canada's immigration system has long been a source of pride for Canadians and of dynamism for the economy. The Government is dedicated to rebuilding the trust of Canadians in immigration by restoring balance to the system."

Employers agree that Canada needs an immigration system that builds trust – trust for foreign workers, employers, and the Canadian public. Historically, our immigration system has been geared towards high-skilled economic immigrants rather than low-skilled streams, but the reality is that Canada needs both. We need to fill jobs all skill levels, across all sectors of the economy and regions of the country. For employers looking to fill low-skilled positions, they have hobbled together an approach that uses the Temporary Foreign Worker Program to address their needs. This solution is inadequate and does not address the core needs of businesses, evidenced by the fact that 90% of all jobs on Job Bank, Canada's job portal, are full-time permanent jobs and 45% of Temporary Foreign Workers in the non-agricultural streams become Permanent Residents.

- Canada needs a permanent immigration path for low-skilled jobs and businesses need an immigration system they can rely on to fill longstanding vacancies in jobs that Canadians and Permanent Residents are not willing to take. To address this need, a taskforce of employer associations produced the following recommendations to improve Canada's immigration system, better protect foreign workers, and help Canadian employers find the labour they need.

The Canadian International Workforce Program would build upon positive aspects of the Temporary Foreign Worker Program, creating a much-needed new immigration stream for employers to fill critical, consistent gaps in the labour force. Like the TFW program, the CIWP will:

- ☐ Connect foreign labour supply to Canada's labour market demand.
- ☐ Enable employers who use the program to do so as a last resort, when they have demonstrated that no Canadian or Permanent Resident will take the job.
- ☐ Complement Canadian workers in workplaces with foreign workers, enhancing productivity.
- ☐ Tie a foreign worker to a job, ensuring that they will be positively contributing to Canada and working in industries, roles, and locations that are consistently vacant.

This paper focuses on reimagining immigration in Canada and includes specific recommendations for low-skilled positions. It's guiding principles are as follows:

- ☐ Protection of foreign workers who come to Canada
- ☐ A pathway to permanent residency for foreign workers who wish to stay in Canada permanently
- ☐ Certainty for employers who need workers from a variety of skill levels
- ☐ Canadian confidence in our immigration system
- ☐ Reputation for Canada as a viable and promising destination for immigrants of all skill levels

Summary of Recommendations:

A Reimagined Immigration System: The Canadian International Workforce Program (CIWP)

The taskforce recommends establishing a new immigration program: the Canadian International Workforce Program. The CIWP would consist of two sub streams: one for temporary and one for year-round immigration.

CIWP 1: A temporary stream that reflects seasonal and temporary low-skilled jobs

This stream would be for workers to come to Canada temporarily for strictly seasonal, low-skilled jobs. These workers come to Canada at a certain time during the year and return home when the season finishes.

CIWP 2: A stream for low-skilled, year-round jobs

These jobs are not temporary nor seasonal in nature. They are in occupations that are consistently vacant year over year and known jobs that Canadians and Permanent Residents do not apply for. Given that no immigration program exists for this circumstance, employers have patched together a system of TFW's getting Permanent Residency via the Provincial Nominee Program (PNP). This new stream would include better integration of pathways to permanent residence for foreign workers.

Recommendations for both streams:

- Extend the LMIA maximum work duration period to 5 years.
- Implement measures to enable employers to retain their foreign workers already in Canada.
- Establish bilateral agreements with source countries. Prioritize countries that Canadian employers consistently recruit workers from to fill long-standing vacancies.

- Expand successful pilot programs that address specific regional or sectoral needs. These programs should allow immigrants with employment at lower-level TEER occupations (4 & 5) to enter if that is in alignment with local labour force needs.
- Strengthen worker protections to include:
 - o stricter regulation of illegitimate immigration consultants and third parties
 - o a robust LMIA process that ensures integrity and legitimacy of employers and job postings
 - o enhanced inspections and consequences for employers who abuse the program
 - o fulsome pre-departure information for foreign workers before they arrive in Canada
 - o an efficient processing system, and;
 - o certainty of pathways to permanent residency

As an interim measure to address the immediate labour crisis (until the CIWP can be introduced), the following changes are recommended for the Temporary Foreign Worker program:

- Reinstate the limit on the number of foreign workers to 20% of full-time, year-round staff, regardless of sector or the duration of the contract.
- Adjust the refusal to process LMIAs in Census Metropolitan Areas (CMAs) where the unemployment rate is 6% or more, to 7% or more, and exclude communities located in the surroundings of large cities.

Why Immigration is Important for Canada

Canada's working-age population is older than ever. By 2030, almost 1 in 4 Canadians will be of retirement-age and we do not have the young people necessary to replace these workers in the labour force. In 2023 the Canadian fertility rate was 1.26 children per woman, which is the lowest level on record from Statistics Canada. This is well below the replacement rate (the number of babies needed for the current population to replace itself) of 2.1. In fact, Canada's fertility rate has been below the replacement rate since 1971¹.

This demographic challenge has put Canadian employers in a desperate situation as they look to replace workers or staff up. There were 547,800 job vacancies among Canadian employers in the fourth quarter of 2024.² While this is down from a peak of almost 1 million job vacancies in the aftermath of the pandemic, employers in nearly all sectors and regions continue to face labour challenges. Job vacancies have contributed to our lagging productivity levels and other macro-economic challenges in Canada. As a last resort, Canadian employers have been turning to immigration to fill critical labour shortages that cannot be filled by Canadian citizens and Permanent Residents.

¹National Post (2024). [Canada's birth rate hits an all-time low second year in a row: StatsCan | National Post](#)

² Statistics Canada (2025). [The Daily — Job vacancies, fourth quarter 2024](#).

This challenge has been amplified for employers looking to fill low-skilled positions. Despite concerns over Canada's high youth unemployment rate (14.2% as of May 2025), there remains a disconnect between job vacancies and younger unemployed Canadians. The fact is that Canada's youth are not taking low-skilled jobs at the rate they used to. The percentage of the working-age population with a post-secondary degree/diploma has been increasing steadily since 2006 and Canada currently ranks first in the G7 for greatest share of the population with a college or university credential.³ Our youth, many of whom are highly educated, are simply not seeking employment in low-skilled, low-wage, or manual labour jobs as they have in the past. For rural and remote employers recruitment and retention are even more difficult, as Canadian youth tend to leave these regions in pursuit of higher education or more high-skilled career opportunities.

A 2024 study by Statistics Canada showed that while lower-skilled and labourer jobs have declined in Canada over the past two decades, these positions still represented over one-third of all jobs in Canada as of 2021. Educational attainment and technological advancements have contributed to Canadian-born workers moving out of lower-skilled occupations – with immigrant and Temporary Foreign Workers backfilling the remaining jobs. From 2001 to 2021, employment in lower-skilled occupations contracted by 500,000. As Canadian-born workers moved out of this skill level in a substantial way, reducing their employment by 860,000, together, immigrant workers and TFWs increased their employment in these lower-skilled jobs by 360,000.⁴

Immigration currently accounts for 100% of Canada's labour force growth and 98% of population growth. Over one-quarter of the 2.3 million jobs added in Canada since 2021 have been filled by temporary residents.⁵ Immigrants bring valuable knowledge, skills and experience that contribute to economic growth in Canada. ESDC's own evaluation of the Temporary Foreign Worker Program in 2022 showed that Canadian firms experience significant positive benefits from TFW employment. The findings from this study revealed that TFW employment is correlated with positive outcomes across eight different firm outcomes: trade participation, trade volume, expanded entry into new foreign markets, and increased product volume, separately for exports and imports.⁶ Foreign workers also make considerable contributions to the Canadian economy. They are working in jobs that complement Canadian jobs. If businesses cannot operate at full capacity because they do not have the staff needed to do so, Canadian workers will face reduced hours or layoffs as business activity decreases or employers close shop altogether. Foreign workers and Canadian workers are in this together – we need both to operate an economy, and a reimagined immigration system could recognize this through balanced and sustainable policies.

³ Statistics Canada (2022). [The Daily — Canada leads the G7 for the most educated workforce, thanks to immigrants, young adults and a strong college sector, but is experiencing significant losses in apprenticeship certificate holders in key trades](#)

⁴ Statistics Canada (2024). Immigration and the shifting occupational distribution in Canada, 2001 to 2021. [Immigration and the shifting occupational distribution in Canada, 2001 to 2021](#)

⁵ Scotiabank (2024). [Closed for Business? Confusion Reigns: Canada Needs Credible Immigration Anchors | Post](#)

⁶ Cardoso (2022). Research on Labour Market Impacts of the Temporary Foreign Worker Program.

The need for labour at all skill levels is not going away, and at a time when Canadian employers are facing significant instability due to tariffs imposed by our closest trading partner, immigration will be critical to strengthen the Canadian economy.

Challenges with Canada's Current Approach to Immigration

We acknowledge that there are pressures on Canada's immigration system. The pace of immigration needs to be sustainable and recognize Canada's ability to successfully absorb newcomers, not just in the labour market but in local communities and consider their impact on social programs like health care and housing. But it is equally important to recognize that immigrants can help build homes and fill jobs in health care, early childhood education, and other areas of need. All of our fellow G7 members are facing the same labour challenges and the global competition for talent is undeniable. Discouraging immigration in the short-term can have negative consequences for the long-term, in terms of our ability to continue to be an attractive destination for workers from around the world. Immigration policy in the last decade has ping-ponged back and forth – with policy changes made to loosen and tighten the rules depending on the political appetite of the time.

Despite the clear need for immigration and the benefits brought by foreign workers, the Government of Canada has made a political U-turn when it comes to immigration policy. The 2025-2027 Immigration Levels Plan aims to reduce the level of temporary residents in Canada to 5% of the population by the end of 2026. This target will result in an outflow of over 900,000 non-permanent residents over the next two years⁷. This is an overcorrection on our immigration levels and it is already negatively impacting Canadian employers who have had to rely on non-permanent streams like the International Experience Program, the Temporary Foreign Worker Program and International Students to fill consistently vacant positions – jobs that Canadians and Permanent Residents simply do not want to take.

These cuts to immigration may result in employers across the country not surviving further cuts to their labour force. In 2024, the TFW Program saw a series of cuts, caps, and rigidities announced to the rules. This includes a refusal to process LMIs in Census Metropolitan Areas where the Unemployment Rate is above 6%, a reduction in the amount of TFWs employers are allowed to hire as a percentage of their total workforce (down from 20% to 10%), a reduction in the duration of employment from two years to one year, and other rigidities that make the program less accessible to employers⁸. On top of these challenges, the processing times for LMIs in the low-wage stream reached over 80 business days in the Spring of 2025. Combined with work permits that could take over 20 weeks to process depending on the source country, this means employers who do manage to access the TFW Program are waiting upwards of 9 months for foreign workers to enter Canada. For some employers, these delays mean they cannot start their season in time, if at all. There is little alignment between Employment and Social Development Canada (ESDC) and Immigration, Refugees and Citizenship Canada (IRCC) when handling their respective sides of the Temporary

⁷ RBC (2024). [How Canada's new immigration targets will impact the economy - RBC Thought Leadership](#)

⁸ Employment and Social Development Canada (2024). [Minister Boissonnault reducing the number of temporary foreign workers in Canada - Canada.ca](#)

Foreign Worker Program. Recent policy changes and ongoing processing delays make it extremely difficult for employers to access the labour they need, further damaging our country's productivity in the process.

Cuts to temporary immigration don't only hurt Canadian employers and workers, they also make temporary foreign workers who are already in Canada more vulnerable to abuse and mistreatment. Without a legal pathway to work and live here, many foreign workers tend to go underground once they lose their status. Without formal oversight of these workers, the government cannot ensure they are being paid fair wages or working in humane conditions, free of abuse or exploitation.⁹

Examples from other jurisdictions

Immigration must be tied to labour market needs. Canada needs an immigration system that reflects the importance of all skill levels and National Occupational Classifications (NOCs). We cannot focus solely on high-skill and professional positions as all skills levels are required to success fully operate and grow an economy. There are many international examples of low-skilled and semi-skilled immigration programs that Canada can draw upon when considering the creation of a new stream for temporary and permanent immigration.

Australia:

The Pacific Australia Labour Mobility (PALM) scheme allows eligible Australian businesses to hire workers from nine Pacific islands and Timor-Leste when there are not enough local workers available. The program allows Australian employers to find workers for unskilled, low-skilled and semi-skilled positions. Employers can hire workers for seasonal jobs (up to 9 months) and longer-term jobs between 1 and 4 years. The PALM scheme helps employers in rural and regional postcodes, across all industries, to address labour shortages.¹⁰

South Korea:

Low birth rates, an aging population, and a shift in Korean's desire to avoid "3D" (dirty, dangerous, and difficult) jobs, have led South Korea to open its borders to non-professional foreign workers. Under the Employment Permit System, South Korean employers can hire foreign workers in low-skilled jobs for up to four years and 10 months. This program sources labor from a total of 16 countries including the Philippines, Mongolia, Sri Lanka, Vietnam, Thailand, and Indonesia. To meet labour demand in targeted industries, South Korea sets a quota for the number of workers it accepts per industry. In 2024, the quotas were as follows:

- Manufacturing: 32,876 workers
- Agriculture and Livestock: 4,356 workers

⁹ Scotiabank (2024). Closed for Business? Confusion Reigns: Canada Needs Credible Immigration Anchors. [Closed for Business? Confusion Reigns: Canada Needs Credible Immigration Anchors | Post](#)

¹⁰ Australian Government, Pacific Australia Labour Mobility. [Home | PALM scheme](#)

- Fisheries: 3,776 workers
- Construction: 583 workers
- Services: 537 workers (including 162 in the restaurant sector)¹¹

Japan:

In 2019, Japan announced the Specified Skilled Worker (SSW) Program - to welcome capable specialists from overseas countries to work in certain Japanese industrial fields, to function as workers ready to take on jobs without prior training. The SSW covers 16 occupations in a wide range of industries including: nursing care, building cleaning management, construction, agriculture, food service, manufacturing, accommodation, forestry and more. The SSW has two streams, one for (i) status workers - for workers in jobs that require a considerable knowledge of or experience in Specified Industry Fields; and (ii) status workers – for workers in jobs that require proficient skills in Specified Industry Fields. The first (i) status could be compared to low-skilled or semi-skilled work and allows employers to hire foreign workers for a period of up to five years.

Bilateral Agreements

A re-imagined immigration system for low-skilled jobs should have a bilateral agreement component with countries that Canadian employers currently source labour from. Bilateral agreements offer many advantages that enhance cooperation between countries while addressing migration challenges. Such agreements promote and enhance labour mobility and reduce bureaucratic obstacles that often result in lengthy processing delays.

Canada's Seasonal Agricultural Worker Program (SAWP) provides an example of a low-skilled immigration stream that benefits from bilateral agreements with Mexico and some Caribbean countries. The Seasonal Agricultural Worker Program (SAWP) allows employers to hire Temporary Foreign Workers from participating countries for a maximum period of 8 months, between January 1 and December 15, provided they're able to offer the workers a minimum of 240 hours of work within a period of 6 weeks or less.

The SAWP operates according to bilateral agreements between Canada and the participating countries. The agreements outline the role of these foreign governments, which is to:

- recruit and select the TFWs
- make sure workers have the necessary documents
- maintain a pool of qualified workers, and
- appoint representatives to assist workers in Canada
 - These governments also ensure that the men and women selected to work temporarily in Canada meet all the requirements of the SAWP.

¹¹ Ministry of Employment and Labour, South Korea. [Employment Permit System](#)

In addition, many of our European counterparts and Australia are advanced in implementing modern immigration strategies, including strong bilateral agreements with countries that have an abundance of workers, such as India.

India became the world's most-populous country in 2023. It is Australia's largest source of skilled migrants and the second-largest source of international students. In May 2023, Australia signed the Migration and Mobility Partnership Agreement, to promote two-way mobility between the countries in the education and business sectors. Australia's Mobility Arrangement for Talented Early-professionals Scheme (MATES) promotes mobility of early professionals and provides Australian industry access to some of India's most talented STEM graduates. Although this agreement is specific to high-skilled immigration, Australia's bilateral relationship with India presents a good example of the types of relationships Canada should be seeking out.

Reimagining Immigration for Low-Skilled Positions in Canada

Canada's immigration system is broken, especially for workers who fill low-skilled, essential jobs in our economy that Canadians and Permanent Residents do not want to take. This includes both temporary or seasonal jobs and year-round permanent work.

According to a 2021 study by Employment and Social Development Canada, the vast majority of TFW postings on the government's hiring platform, Job Bank, are for permanent roles. About 87.6% of TFW postings advertised permanent jobs while 7.7% were for seasonal roles, 4.5% for term (contract) jobs, and 0.2% were for casual roles. In contrast, 79.8% of non-TFW postings advertised permanent jobs while 9.8% were for term (/contract) jobs, 6.9% for seasonal roles, and 3.5% for casual roles.¹²

For employers of year-round permanent work, these foreign workers often want to stay in Canada permanently but the pathway to permanent residency is riddled with roadblocks. Temporary Foreign Workers and the employers who bring them into Canada have for too long relied on a patchwork system to transition foreign workers into Permanent Residents – utilizing various pilots and relying on the Provincial Nominee Program, which has now seen a 50% reduction in allocations for the year 2025.

The Temporary Foreign Worker Program is tied to a job, it ensures that immigrants coming into Canada are employed and contributing positively to Canada's economy, but for reasons previously mentioned it needs an overhaul. The Taskforce recommends the Government establish a new immigration stream: the Canadian International Workforce Program, to facilitate both temporary and permanent immigration for low skilled workers.

¹² Employment and Social Development Canada (2021). 2019-2020 EI Monitoring and Assessment Supplemental Study: Patterns of Job Bank Use by Employers of Temporary Foreign Workers.

A Reimagined Immigration System: The Canadian International Workforce Program (CIWP)

The proposed Canadian International Workforce Program would consist of two streams: one for temporary and one for year-round immigration.

For both of these streams, we recommend the following:

- Extend the LMIA maximum work duration period to 5 years. Employers need certainty and predictability in their workforce, and the current 1-year work duration fails to provide any stability for employers, especially those with long-standing vacancies who use the TFW program year after year. For seasonal positions, consider building in rules around time spent out of the country, to account for seasonal work within a five-year work duration. By extending the work duration, government will also see a reduction in administrative costs and processing delays relative to LMIA applications and renewals.
- Implement measures to enable employers to retain their foreign workers already in Canada. This will enable employers to preserve the continuity of their workforce and meet the needs of local labour markets.
- Establish bilateral agreements with source countries. Prioritize countries that Canadian employers consistently recruit workers from to fill long-standing vacancies.
- Expand successful pilot programs that address specific regional or sectoral needs. A low-skilled immigration system must recognize the unique characteristics and needs of regions and sectors. Pilot programs can be a good first step in bringing people to Canada more quickly and helping targeted businesses in high-demand sectors and regions. Some of the pilot programs have made real progress and could be expanded or further improved with a few adjustments, such as the Rural and Northern Immigration Pilot or a variant of the Atlantic Immigration Pilot. These programs should allow immigrants with employment at lower-level TEER occupations (4 & 5) to enter if that is in alignment with local labour force needs.

As an interim measure to address the immediate labour crisis (until the CIWP can be introduced), the following changes are recommended for the Temporary Foreign Worker program:

- Reinstate the limit on the number of foreign workers to 20% of full-time, year-round staff, regardless of sector or the duration of the contract.
- Adjust the refusal to process LMIAs in Census Metropolitan Areas (CMAs) where the unemployment rate is 6% or more, to 7% or more, and exclude communities located in the surroundings of large cities.

CIWP 1: A temporary stream that reflects seasonal and temporary low-skilled jobs

- This stream would be for workers who come to Canada temporarily for strictly seasonal low-skilled jobs. These workers come to Canada at a certain time during the year and return home when the season finishes.
- These workers are often repeat users of the program – meaning they enter Canada to work for roughly the same period of time, year after year. They come for the season and go home again. These workers do not wish to reside in Canada permanently and may see the temporary immigration as a way to earn a better living and bring those wages back to their home country and family once the job is complete.
- This program would function similarly to the Seasonal Agricultural Worker Program (SAWP) and would be targeted to a temporary migratory labour force. While the SAWP is essential to the success of agricultural businesses across Canada, its current timeline of 8 months disserves many businesses, especially farms that grow multiple crops. These farms may need workers for pruning in February and for harvesting as late as November. The current 8 month-limit leaves employers short-handed in crucial business periods. The taskforce recommends that under this stream, the timelines be extended to 10 months.

CIWP 2: A stream for low-skilled year-round jobs

- These jobs are not temporary nor seasonal in nature. They are in occupations that are consistently vacant year over year and known jobs that Canadians and Permanent Residents do not apply for. Given that no immigration program exists for this circumstance, employers have patched together a system of TFW's getting Permanent Residency via the Provincial Nominee Program (PNP). This new stream would include better integration of pathways to permanent residence for foreign workers.
- This pathway would enable employers to retain their employees more easily and allow foreign workers who are already well-integrated into a community to remain in Canada.

Proposed points-system for this stream (examples for consideration).

Workers would get points for:

- working in an occupation that has proven long-standing labour shortages in Canada.
- working in a rural and/or remote area with a demonstrated long-standing labour shortage
- If the Job Vacancy Rate is higher than the national average and the Unemployment rate is lower than the national average, then the foreign worker would qualify
 - Note: employers are concerned with the Government of Canada's current definition of rural and remote. The use of Census Metropolitan Areas (CMAs) as a definition relevant to the TFW Program lately has created issues for smaller communities encompassed within them. For example, the CMA for Montreal includes Oka and other small regions that don't share the same labour market realities as their urban neighbour. A point system should consider including small communities (e.g. less than 30,000 in population), not only rural and remote.
- if their employer is willing to hire them (demonstrated through a letter of support/attestation)

- a level of proficiency in English or French
- reference letters
- if their spouse is in Canada and has a job or speaks an official language
- Canadian experience - if they have been consistently employed in Canada for a certain number of years
- previously having paid taxes in Canada
- age and adaptability

Strengthening Worker Protections

To avoid the social and economic consequences of an aging population and declining birth rates, the federal government should re-establish an immigration system that combines a sustainable intake model that is targeted to labour demands, with strong worker protections.

Strengthening worker protections under a new immigration system should include:

- stricter regulation of immigration consultants and third parties or “unscrupulous recruiters”
- a robust LMIA process that ensures integrity and legitimacy of employers and job postings
- enhanced inspections and consequences for employers who abuse the program
- fulsome pre-departure information for foreign workers before they arrive in Canada
- an efficient processing system, and;
- certainty of pathways to permanent residency

Stricter regulation of immigration consultants and third parties or “unscrupulous recruiters”

Third party consultants play a significant role in the reported cases of exploitation or abuse of foreign workers in Canada. The new stream should prioritize a robust detection mechanism for third party misconduct and impose stronger consequences for employers and third parties who break the rules. This must include stronger efforts to identify and shut down fraudulent immigration consultants who prey on foreign workers. IRCC [established](#) the College of Immigration and Citizenship Consultants in 2021 to regulate immigration and citizenship consultants and protect the public. The college is a key part of the government’s efforts to fight fraud in Canada’s immigration system. In January 2025, IRCC proposed new rules to improve the regulation of immigration and citizenship consultants. The proposed regulations ¹³ would:

- elaborate on the college’s authorities under the College of Immigration and Citizenship Consultants Act (College Act) in such areas as
 - the public register of immigration consultants
 - the complaints and discipline processes
 - investigations conducted by the college

¹³ [Canada Gazette, Part 1, Volume 158, Number 51: College of Immigration and Citizenship Consultants Regulations](#)

- establish a compensation fund for victims of unethical immigration consultants
- clarify the minister's power to appoint someone to take over board duties if the board fails to meet its responsibilities under the College Act

At a high-level, employers are supportive of any efforts to professionalize and implement safeguards for companies (and individuals) who seek to use the services of an immigration consultant. Immigration paperwork can be complicated, and employers should have peace of mind and know that they are getting the best advice to improve the quality of their applications. We echo the recommendations made by the Canadian Association of Professional Immigration Consultants on the need to differentiate between unauthorized practitioners and authorized representatives, such as immigration consultants, lawyers and members of the *Chambre des notaires du Québec*. Unauthorized practitioners are damaging the credibility of legitimate immigration consultants and eroding the integrity of our immigration system. Despite their actions being illegal, these unauthorized practitioners are rarely and inadequately prosecuted.

Employers recommend that additional resources be directed towards identification and further disciplinary measures for unauthorized practitioners or disbarred immigration consultants that continue to operate underground. Any efforts must involve greater collaboration with Canada Border Services Agency (CBSA). A specialized CBSA unit that is dedicated to investigating and prosecuting these unregistered individuals, as well as clear messaging on how to report these individuals to law enforcement is needed. Furthermore, we must consider actions to discipline or deter illegitimate practitioners that operate outside of Canadian borders. This will involve diplomacy and information sharing with other countries to incite enforcement of the rules beyond Canadian jurisdiction, including limiting the actions of ghost consultants operating abroad.

Enhanced inspections and consequences for employers who abuse the program

A redesigned immigration system for low-skilled jobs must have worker protection at its core. Bad actors have brought down the reputation of good employers and diminished public trust in the current system. Enhanced enforcement and integrity measures could include an applicant traceability system, ombudsman and audits of employers within the new streams. Good employers, of which the vast majority of employers are, welcome enhanced integrity measures so that we may weed out those who exploit the system. Integrity measures should also be directed towards the foreign worker. For example, to provide employers with the confidence that the foreign worker they are employing is still in good standing (e.g. has a valid work permit) and in instances where a foreign worker may be falsely accusing an employer of abuse in order to obtain an open work permit, timeliness of inspections will be crucial to a fair process. Inspections should be completed as quickly as possible for the benefit of workers and employers alike. The current timeline for inspections is insufficient, with employers often dealing with multiple inspectors due to turnover at ESDC, leaving them unable to recruit for long periods of time while awaiting a decision.

Fulsome pre-departure information for foreign workers before they arrive in Canada

Foreign workers should be adequately equipped with information prior to their arrival in Canada. Pre-departure information helps a worker understand their role, integrate into the host culture, make informed decisions, and prepare for their new environment. A reimagined immigration system must also include pre-departure information on the status of a foreign workers' LMIA and work-permits and set realistic expectations for pathways to permanent residency. There have been reports of foreign workers being lured to Canada by unscrupulous third parties on the false promise of a job that would lead to permanent residency, when no such job or pathway exists. By informing foreign workers of their pathways before they arrive in Canada, we may be able to prevent the exploitation of vulnerable workers by third parties who over-promise and under-deliver when it comes to obtaining PR in Canada. Other components of pre-departure training should include cultural awareness programs, preliminary visits, and language training to ensure smooth integration for these workers.

An efficient processing system

In the spring of 2025, processing times for LMIAs reached over 80 business days. Combined with work permits that could take over 20 weeks to process depending on the source country, this meant employers who did manage to access the TFWP are still waiting upwards of 9 months for foreign workers to enter Canada. Worse, processing times for the Permanent Resident Stream have risen to over 200 business days. Longer processing times mean prolonged vacancies, roadblocks to workforce planning and further negative impacts to productivity for Canadian employers. Foreign workers who are already in Canada are impacted by processing delays as well, with many workers losing status while they await the renewal of their LMIA or work permit. We cannot reimagine Canada's immigration system without addressing the significant processing delays that are keeping employers and workers from accessing it in the first place.

Certainty of pathways to permanent residency

As mentioned previously, a reimagined immigration system for low-skilled positions must instill confidence for workers and employers alike. An integral part of rebuilding confidence will be to establish certainty and clarity in the pathways to permanent residency for foreign workers in this stream.

Conclusion

In the wake of a trade-war and global market turmoil, Canada's political leaders have stressed the need to increase investment and improve productivity in our country. At the same time, they are focused on cutting immigration levels. These two priorities cannot exist together. We simply cannot increase the productivity of our economy without the labour needed to do so. Immigration has accounted for all of our labour force growth in recent years and due to demographic challenges beyond our control, Canadian employers must continue to rely on foreign workers to fill

consistently vacant positions. The government has an important role to play in ensuring that our immigration system remains fair and protects workers, while meeting the needs of Canada's labour force. This will undoubtedly require a multi-pronged strategy, with efforts to first hire locally, while utilizing immigration to meet our currently unmet labour and productivity needs. The Canadian International Workforce Program is a sustainable immigration program that is tied to labour force demand and is critical to our long-term economic viability.

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Colin Carmichael
Executive Director
Huron Chamber of Commerce

Paul Butler
Executive Director
Jasper Park Chamber of Commerce

Tracey Clarke
Executive Director
Comox Valley Chamber of Commerce

Tessa Masi

Executive Director
Steinbach Chamber of Commerce

Samantha Hackett

Executive Director
Tofino Chamber of Commerce

Charla Robinson

President
Thunder Bay Chamber of Commerce

Shannon Merrifield

CEO
The Saint John Region Chamber of Commerce

Kim Wilson

CEO
Chamber of Commerce for Greater Moncton

Morgan Peters

CEO
Fredericton Chamber of Commerce

Lexie Jasiewicz

Executive Director
Truro & Colchester Chamber of Commerce

Linda Machniak

CEO
Battlefords & District Chamber of Commerce

David Prang

CEO
Chamber of Commerce Brantford-Brant

Paul Markle

CEO
The Greater Barrie Chamber of Commerce

Monica Gaudet-Justason

President and CEO
New Brunswick Business Council

Rhonda Tulk-Lane

CEO
Atlantic Chamber of Commerce

Juanita Polegi
Executive Director
Yorkton Chamber of Commerce

Jo Charnock
Executive Director
St Andrews Chamber of Commerce

Bev Vandersteen
Executive Director
Fort Nelson & District Chamber of Commerce

Donna Backer
CEO
North Bay & District Chamber of Commerce

Doug Griffiths
President and CEO
Edmonton Chamber of Commerce

Keitha Robson
CAO
Timmins Chamber of Commerce

Wendy McDougall
Executive Director
Ferne Chamber of Commerce

Melanie Myers
Executive Director
Kicking Horse Country Chamber of Commerce

Rick Dumas
President
Northwestern Ontario Municipal Association (NOMA)

Rebecca Shelley
Executive Director
Grimsby & District Chamber of Commerce

Stu Niebergall

President & CEO
Regina & Region Home Builders' Association

Patty Hughes
Chief Executive Officer
Prince Albert and District Chamber of Commerce

Yvonne Weinmeier
Executive Director
St. Paul & District Chamber of Commerce

Scott Wheatley
Executive Director
Cloverdale District Chamber of Commerce

Jim Bence

President and CEO

Hospitality Saskatchewan

Bianca McGregor

Chief Executive Officer

Greater Charlottetown Area Chamber of Commerce

Natasha Chestnut

Executive Director

Restaurant Association of Nova Scotia

Tracy Douglas

President & CEO

Alberta Hotel & Lodging Association