

**Written Submission in response to
Immigration, Refugees and Citizenship Canada's
Consultation on**

**Enhancing Express Entry Through
Category-based Selection to Better
Meet Canada's Evolving Economic Needs**

Submitted by:
Tourism Industry Association of Canada

January 2023

Introduction

The Tourism Industry Association of Canada (TIAC) respectfully presents this submission to the Minister of Immigration, Refugees and Citizenship, the Honourable Sean Fraser, with respect to Immigration, Refugees and Citizenship Canada's (IRCC) consultation on *Enhancing Express Entry Through Category-based Selection to Better Meet Canada's Evolving Economic Needs*.

Founded in 1931, TIAC serves as the national private-sector advocate for Canada's tourism sector. Acting on behalf of thousands of tourism businesses across the suite of industries our sector encompasses, we represent tourism interests at the federal level, and our advocacy work involves promoting and supporting policies, programs and other initiatives that will foster the sector's overall development and growth.

TIAC is a not-for-profit, non-governmental organization. Based in Ottawa, Ontario, it is the national industry association representing Canada's tourism sector.

Before addressing the specific questions posed in the IRCC consultation document, we share the following background which we believe will help to place our responses into broader context.

Background and Context

The tourism sector was the first hit, the hardest hit and is now the very last of all sectors to recover from the pandemic.

Prior to 2020, total tourism spending in Canada had been consistently growing for many years and even outpacing the annual growth rate of Canada's economy overall.

Going into 2020, total tourism spending hit an all-time high of \$105 billion, which represented 2% of Canada's total GDP. One year later, tourism spending dropped by half, down to just over \$53 billion. Domestic spending decreased by 40% and international spending dropped very significantly by 87%.

There is a direct correlation between tourism spending and GDP. Hence, tourism GDP also dropped by 50%, decreasing its contribution to Canada's total GDP to 1%.

No tourism industry was spared by the pandemic.

Before COVID, tourism accounted for 748,000 direct jobs and supported just over 2 million in total. One out of every ten workers in Canada had a job related to tourism. But, one year later, the number of direct jobs decreased by close to 30% (a decline of 533,000) and all related jobs dropped by 23% to 1.6 million.

The most recent estimates released by Destination Canada indicate total tourism spending is now on track to fully recover to pre-pandemic levels in 2024 – domestic spending is poised to fully recover in late 2023; US spending by 2024; and overseas visitation by 2025.

But in interpreting these estimates, current high inflation levels now must also be considered. As such, adjusted for inflation, “real” tourism spending will actually recovering much slower than current estimates predict, lagging by 2 to 3 years. So, total spending is actually only really expected to recover mid-way through 2026.

With regard to the tourism labour market, a July 2022 report for Tourism HR Canada (THRC) produced by the Conference Board of Canada indicated that total job vacancies in the tourism sector amounted to more than 200,000 in 2021.

That same study showed that in 2021 tourism occupations had an average vacancy rate of 5.9 per cent, or almost two percentage points higher than the vacancy rate in the overall economy.

Further, the current projections to meet employment demand by 2025 in the Accommodation, Food and Beverage Services industries alone amount to over 1.2 million jobs. And projections from 2025 to 2030 show a growing shortage of workers in the five tourism sectors: Accommodation; Food and Beverage Services; Leisure and Entertainment; Transportation; and Travel Services. By 2030, a minimum of 2.5 million workers would be needed to meet expected demand.

The most recent Statistics Canada data on job vacancies and job vacancy rates by industry sector clearly indicate that the Accommodation and Food and Beverage Services industries – which are among the largest employers in the tourism sector – had higher job vacancy rates compared to construction (trades), administrative and support services, waste management and remediation services, health care and social assistance, other services, professional, scientific and technical services.

The shortage of labour in tourism has long been identified as a significant barrier to the sector’s growth. While the dearth in supply of workers predates the pandemic, COVID vastly compounded these chronic issues.

Because of the nature and complexity of the underlying issues, labour shortages in tourism are anticipated to be long-lasting. Leading experts estimate it could take many years before the sector reaches pre-pandemic employment levels unless immediate and concerted action is taken.

We stress the symbiotic relationship between the tourism sector’s recovery/growth and the availability of workers. The tourism labour market is highly competitive with other industries and other jurisdictions. This is highly relevant because, at its core, tourism is driven by people who must, at the very least, meet traveller expectations for an exceptional experience all along the value chain, whether for leisure or for business

travel. Thus, a lack of workers directly translates to a decline in the value-proposition and lower capacity in the tourism sector.

As such, the recovery of Canada's tourism sector to pre-COVID levels, let alone positioning it for future growth, very largely hinges on our ability to attract and retain an adequate supply of workers across the skills spectrum. Thus, our success in rebuilding tourism and positioning it for future growth is largely dependent on redressing labour shortage issues to ensure an abundant and consistent workforce.

We point out that immigrants represent a significant proportion of Canada's tourism workforce. Landed immigrants accounted for about 29% of tourism workers in 2022. This is up from 26% in 2016 and 23% in 2011. And the immigrant working population within the Accommodation and Food and Beverage Services industries, more specifically, are even higher, at just over 31%.

Thousands of businesses in the tourism sector across Canada rely on immigrants to be able to fill positions such as Chef, Restaurant and Food Service Managers, Food Service Supervisor, Accommodation Service Managers, Cooks, and Bakers, all occupations deemed eligible under the Express Entry system.

While the Express Entry system cannot alone solve all of the labour issues in tourism, it could nonetheless help address some of our worker supply challenges in the short term if appropriate modifications are made.

We highlight that the Hotel Association of Canada (HAC) and THRC have shared their respective submissions to this consultation with us. We also note that we obtained input from the Réseau de développement économique et d'employabilité (RDÉE Canada) specifically related to the sections touching on francophone and bilingual candidates. Each of these organizations are thought leaders and centres of expertise related to the tourism labour market. We fully support both HAC and THRC's submission. And trust that our reiteration of some of their responses as well as the input provided by RDÉE Canada will be helpful to your officials as they contemplate changes to the Express Entry system.

We are available at your convenience to expand on these responses or to answer any questions you may have.

Selecting candidates based on work experience in a particular occupation or sector

Q4 – Selecting on the basis of work experience in occupations or sectors experiencing chronic shortages could be a way to improve the responsiveness of the economic immigration system.

According to Statistics Canada, the most acute skilled shortages are found in construction (trades), administrative and support services, waste management and remediation services, health care and social assistance, and other services (with the exception of public administration, which is considered a separate industry as per the North American Industry Classification System).

Are these areas of concern to your organization? Are there other occupations or sectors experiencing chronic and long-term needs that you could identify, and for which permanent residence through Express Entry can complement in-Canada solutions (such as better wages and working conditions, skills upgrading and improving productivity)? For each identified occupation or sector, we would also appreciate considerations on numbers, including data. How might solutions incorporate equity considerations?

Answer:

TIAC fully supports the view that selecting successful Express Entry applicants on the basis of work experience in occupations or sectors experiencing chronic shortages would be a way to improve the responsiveness of the economic immigration system. Doing so by prioritizing workers possessing experience in the tourism sector, more specifically, could help address some of the workforce shortage issues in tourism already noted.

The table below, which was provided by THRC in its submission, shows the number of vacancies in 11 tourism occupations during the peak tourism season in 2021 and at the beginning of the 2022 tourism season.

Total job vacancies by occupation, Canada — the third quarter 2021 (July to September 2021) and second quarter 2022 (April to June 2022)

Profession	3rd quarter 2021	2nd quarter 2022
Counter attendants, kitchen helpers and related support personnel (NOC 6711)	70 410	79 115
Food and beverage servers (NOC 6513)	34 180	26 340
Cooks (NOC 6322)	31 445	29 455
Housekeeping and cleaning workers—light work (NOC 6731)	16 875	19 800
Food Service Supervisors (NOC 6311)	8 545	8 525
Butlers and hostesses (NOC 6511)	4 365	3 105
Bartenders (CNP 6512)	4 265	4 420
Chefs (CNP 6321)	3 815	3 410
Restaurant and Food Service Directors (NOC 0631)	3 810	4 535
Sports, Recreation and Amusement Park Operators (NOC 6722)	3 035	3 970
Hotel receptionists (NOC 6525)	2 300	3 070

As evidenced by the above data, the majority of the vacancies are in TEERs 4 and 5. Teer 4 is defined as “occupations that usually require a high school diploma, or several weeks of on-the-job training.” Teer 5 is defined as “occupations that usually need short-term work demonstration and no formal education.”

Based on current policies of the Express Entry system, occupations in TEERs 4 and 5 generally do not qualify and therefore immigrants are ineligible to apply.

The tourism sector has a long history of welcoming and integrating not only immigrants but the most vulnerable groups like immigrant women and visible minority immigrants into Canadian society by equipping them with transferrable skills and acquainting them with Canadian workplace cultures to help them successfully pursue their career paths.

We therefore recommend that the federal government modify the Express Entry system to prioritize the participation of workers in the occupations noted above. This would aid in addressing the chronic worker shortages in tourism and hospitality as well as having the positive effect of increasing the participation of vulnerable populations and under-represented groups in the labour market.

As THRC also pointed out, the integration of new Canadians into the workforce could be achieved through a comprehensive tourism immigration strategy. This strategy would optimize existing immigration pathways and explore alternative pathways to meet the needs of the tourism sector.

Transitioning international student graduates to permanent residence

Q5a – We are interested in your feedback on whether selecting international student graduates could help to fill labour market needs quickly. To what extent would increasing the number of international students that transition to permanent residence through Express Entry help respond to current economic needs and priorities?

- Strongly positive impact
- Somewhat positive impact
- No impact
- Somewhat negative impact
- Strongly negative impact
- I don't know

Q5b – Please provide details on why increasing transitions to permanent residence through Express Entry would/would not help respond to existing needs. Are there any gaps that need to be addressed?

Answer:

As THRC points out in its submission, international students have a unique position in Canada's immigration system and are typically successful in integrating into the workforce compared to other newcomers via other immigration streams.

International students are an integral part of the seasonal segment of the tourism sector and thus have a high potential to transition to the permanent workforce which will both propel their careers and support the recovery and growth of the tourism sector.

According to Statistics Canada, 30% of international students who arrived in Canada after 2000 transitioned to permanent residency within 10 years of receiving their first study permit. Further, half of master's level students, and 60% of doctoral level students made the transition within the same time period.

The Canadian Bureau of International Education reported that Canada was home to 621,565 international students in 2021. It also reported an increase in the international student population of 135% between 2010 and 2020, with 60% of international students planning to apply for permanent residency and 96% of international students saying they recommend Canada as a study destination.

Tourism provides significant employment for young people, especially young immigrants including international students. According to THRC's latest tourism census data, 18.7% of landed immigrants who worked in the tourism sector were youth in May 2022 – much higher proportion than in the economy overall (7.9%).

According to IRCC's data on International Mobility Program (IMP) work permit holders by intended occupation, IMP work permit holders are employed across the whole tourism sector with the exception of the Transportation industry. Since 2015, the tourism sector had been receiving about 4.5-5% of IMP work permit holders pre-pandemic, but this decreased to 2-3% post-pandemic, while the overall number of IMP workers increased.

Among all IMP work permit holders, 32% is from the Post-Graduation Work Permit Program (PGWPP), which are international students. By analogy, an average of 1.6 % of tourism workforce will come from international students, which are projected to be 34,150 in 2025.

Compared to other permanent resident candidates, international students face fewer obstacles with respect to credential recognition and language proficiency, are familiar with the culture, and have already built social networks in Canada.

However, international students also face unique challenges in transitioning to permanent residency. Upon graduation, they are forced to navigate their own way through the system to permanent residency without support from their educational institutions. Of international students who gained permanent residence, 88 per cent had multiple temporary visas before transitioning to permanent residence. Moreover, as temporary residents they do not have access to federally funded settlement services, and this is when the support is needed the most.

The services available to international students making the transition to permanent residency are limited and employers often are not able to assist temporary permit holders along their pathways to permanent residency.

These challenges highlight the need to accelerate international students' transition to permanent residency through policy changes to the Express Entry system by creating a centralized system which would allow international students to transition to permanent residency. Allowing students to apply directly through Express Entry would create a strong alternative to the current provincial-based system and would create greater certainty for international students as well as employers in the tourism and hotel sectors who are seeking to hire international students on a permanent basis, either before or upon their graduation.

Beyond the limited settlement support international students could receive, especially the support to understand their immigration options and the process of navigating Canada's immigration system, there are still gaps that have been identified by a number of tourism stakeholders.

The tourism sector is comprised a large proportion of National Occupational Classification (NOC) C and D skill level jobs. However, international students with experience in these jobs cannot apply for the Federal Skilled Workers Class or the Canadian Experience Class via Express Entry.

Even with the extension of 18-month open work permit after graduation, many students will still face the challenges of the limited availability of entry-level professional jobs and are unlikely to have the enough job experience to qualify for the Express Entry Federal Skilled Worker (FSW) program.

As the HAC aptly points out in its submission, it is important to highlight that many international students pursuing other degrees in non-related fields are interested in doing "gap year" work after graduating. In this regard, and with a view to helping address worker shortages in tourism and hospitality, we recommend expanding post-graduation work permits for all students to three years. This would mean that hospitality students, for example, who are doing a 1-year program would be eligible for the same work permits as those doing undergraduate degrees.

Q6 – What are the most important considerations to take into account when defining categories for selection for international students? In your response, you might wish to consider sectors or occupations with the most critical needs, recent work experience in Canada, or recent Canadian credentials from a designated learning institution, whether international students with limited to no Canadian work experience should be considered for eligibility, and any considerations with respect to numbers in this category, for example.

Answer:

According to Statistics Canada, almost 75% of all PGWP holders became permanent residents within five years of having obtained their PGWP.

Through participation in the PGWPP and subsequent transition to permanent residence, international students have provided a growing source of labour for the Canadian labour market that extends well beyond their periods of study.

To ease the chronic and longstanding labour shortage challenges faced by the tourism sector, we recommend increasing the numbers in this category by:

- Lowering the points required to qualify for permanent residence in Express Entry, and to count semi-skilled work (NOC level C) and unskilled work (NOC level D) as relevant Canadian work experience.
- Counting work experience obtained through research assistantships, teaching assistantships, internships, and co-op placements, which usually is part-time or temporary, as work experience for immigration purposes.
- Allocating higher points for international students with work experience in the tourism sector or graduating with a tourism-related degree or diploma from an accredited educational institution.
- Crediting part-time as well as full-time educational enrolment.

Q7 – Is there any other feedback you would like to provide about selecting international students in Express Entry?

Answer:

None at this time.

Transitioning temporary foreign workers to permanent residence

Q8a – We are also proposing that selecting temporary foreign workers, with in-Canada experience, could address current chronic labour market needs. To what extent would increasing the number of temporary foreign workers that transition to permanent residence through Express Entry help respond to current economic needs and priorities?

- Strongly positive impact**
- Somewhat positive impact
 - No impact
 - Somewhat negative impact
 - Strongly negative impact
 - I don't know

Q8b – Recognizing existing provincial/territorial and federal programs that support the transition of temporary foreign workers to permanent residence, please provide details on why increasing transitions through Express Entry would/would not help respond to existing needs. Are there any gaps that need to be addressed?

Answer:

We agree that selecting temporary foreign workers (TFWs) with in-Canada experience could address some of the current chronic labour market needs in the tourism sector.

Transitioning TFWs in Canada to permanent residence will help Canada meet some of its annual immigration level targets. As THRC has pointed out, according to IRCC data, there were 120,070 TFW work permits issued in 2022. If all of them were eligible for permanent residence, it would have accounted for some 50% of the economic immigrant targets of 2022.

TFWs having working experience in Canada and who are currently employed would integrate well and without displacing others in the labour market. In addition to helping Canada achieve its immigration targets, transitioning them to permanent residency would recognize their value and contribution to Canada and would help the country move more fully beyond recovery from the pandemic, especially in the tourism sector.

However, TFWs are typically tied to a specific job, and to a specific employer in one location. This has the practical effect of limiting mobility.

Providing permanent residency to eligible TFWs would enhance their mobility and employability. The increased domestic labour force migration could also help ease the population imbalance and increase competitiveness in rural communities.

The tourism sector now accounts for about 10-11% of all TFWs on average, with the overall numbers higher than before the pandemic, especially in Food and Beverage Services sector.

Considering the growing labour challenges now faced by the tourism sector, integrating a pathway to permanent residency for TFWs specifically in the tourism sector would certainly help attract more workers to this sector. The following table of IRCC data shows the top seven tourism related occupations hiring most TFWs in 2022:

Occupations	Number of TFWs in 2022 (till Sep)	IRCC Skill Category
Cooks	4395	B
Food service supervisors	3035	B
Landscaping and grounds maintenance labourers	970	D
Retail sales supervisors	945	B
Light duty cleaners	610	D
Food counter attendants, kitchen helpers and related support occupations	325	D
Restaurant and food service managers	325	O

As previously noted, a large portion of tourism occupations are categorized under NOC B, C, D levels. Even though occupations under NOC B are eligible via the Express Entry system, at least half of the occupations are not. IRCC data also show that in 2019 NOC C received a disproportionately large number of permits (87.4%) while NOC B and D were disproportionately low at 7.1% and 5.5% respectively.

It is important to highlight that based on labour market need projections for 2019-2028, we can expect approximately one third of job openings per year to be in lower-skilled occupations in sectors that traditionally employ temporary workers to fill ongoing needs. Despite the demand, workers in lower-skilled occupations have limited options to transition to permanent residence through other programs. Their levels of education and official language capacity are not elevated enough for most immigration programs. And while most provinces do include lower-skilled workers in their Provincial Nominee Programs, there are very few available spots for them. This is a huge gap that needs immediate attention, otherwise Canada could lose out on a significant potential labour force.

Q9 – What are the most important considerations to take into account when defining categories for selection for temporary foreign workers? Are there needs in specific areas (in certain skillsets or sectors, such as healthcare or STEM) that could be met by increasing transitions of temporary foreign workers to permanent residence through Express Entry?

In your response, you may wish to comment on chronic and long-term needs that cannot be solved through in-Canada solutions, such as better wages and working conditions, or skills upgrading and improving productivity, including with capital and technological investment. You may also wish to comment on whether to focus on workers who are in Canada versus those with recent experience who may/may not currently reside in the country, as well any implications from a diversity and anti-racism perspective. We would welcome any considerations with respect to numbers.

Answer:

As noted earlier, the tourism sector has long faced chronic labour shortages that can not be fully addressed through in-Canada solutions. And the evidence shows that unless concerted action is taken the gap between supply and demand will only widen. Data also show that the challenges in the tourism sector are far greater than they are in other sectors.

Therefore, there is a considerable urgency in the need to prioritize the tourism sector via the TFWP. Doing so would be significantly impactful in addressing labour shortages and helping the tourism sector to fully recover from the pandemic and to position it for continued growth thereafter.

As also highlighted by THRC, to support the tourism sector in meeting its labour market needs, the government could make modifications:

- To ensure a sustainable, high-volume, and dedicated pathway to permanent residency for tourism workers, including workers in NOC C and D occupations.
- To restructure the LMIA process so that applicants with tourism working experience and who intend to work in the tourism sector get more points.
- To include tourism-related occupations with severe labour shortages on the essential occupation list for future public policy consideration.
- To allocate extra points to workers who are in Canada and those with recent experience in the sectors with highest job vacancy rates who may not currently reside in the country to ensure both types of workers are eligible to apply for permanent residency.
- To issue a bridging open work permit for all TR to PR Pathway applicants including seasonal workers and workers in lower-level occupations ensuring

their financial independency while they wait a decision on their acceptance to permanent residency.

- Increase immigration quota to prioritize workers qualified in critical/demand sectors and currently living in Canada.

Q10 – Is there any other feedback you would like to provide about selecting temporary foreign workers in Express Entry?

Answer:

To better address the ongoing labour force shortages, and ensure employers' compliance with legal requirements to protect TFWs rights, we reiterate the following recommendations that were provided by THRC in its submission:

- Allocate 10-20% of economic Principal Applicant admissions towards lower-skilled workers.
- Establish a Trusted Employer system to streamline the application process for Canadian companies hiring temporary foreign workers to fill labour shortages and make sure that smaller firms with lower wage positions are also able to qualify.
- Introduce mechanisms to protect foreign workers and shield the domestic workforce from any deterioration of wages.
- Reduce the financial burden on employers by waiving the cost of submitting an LMIA or, alternatively, having a flat fee of \$1,000 per LMIA and not charge for additional positions.
- Open the TFW program to all types of jobs and all sectors, regardless of the prevailing regional unemployment rate as a temporary measure to address immediate labour shortages caused by the pandemic.
- Improve and simplify the TFWP and permanent immigration system to help small and medium enterprises lacking HR expertise and finances more easily navigate the process.

Selecting Francophone and bilingual candidates

Q11a – We are interested in your views on whether a category designed to select on the basis of French language proficiency could help fill labour shortage demands in Francophone minority communities. To what extent would the further promotion of Francophone immigration through Express Entry help address economic needs or labour shortages?

Strongly positive impact

- Somewhat positive impact
- No impact
- Somewhat negative impact
- Strongly negative impact
- I don't know

Q11b – Please provide details on why the further promotion of Francophone immigration through Express Entry would/would not help respond to existing needs. Are there any gaps that need to be addressed?

En tourisme, la promotion accrue de l'immigration francophone dans le cadre d'Entrée express permettrait de cibler les immigrants selon leur langue et leurs expertises et permettra ainsi de répondre plus efficacement aux besoins réels des communautés. De plus, l'industrie touristique dans les communautés francophones en situation minoritaire a grandement besoin de travailleurs qualifiés dans ces cinq secteurs du tourisme : hébergement ; services de restauration ; loisirs et divertissement ; transport ; et services de voyages.

Tourisme RH affirme qu'en mai 2022, il manquait encore 203 000 travailleurs dans l'industrie du tourisme au Canada. Ces chiffres démontrent que l'accueil de 4,4 % de 82 880 résidents permanents, soit de 3 647 francophones, dans le cadre de programmes fédéraux pour les travailleurs hautement qualifiés ne suffira pas à combler les postes en tourisme.

Il serait aussi très important de travailler de concert avec les communautés francophones en situation minoritaire pour s'assurer que les immigrants auront de l'hébergement et du soutien à l'intégration.

Q12 – What are the most important considerations to take into account when defining categories for selection for Francophone immigration? In your response, you might wish to consider the level of proficiency in French, specific requirements for certain trades or professions, experience in sectors or occupations with the most critical needs, work experience in Canada, or Canadian educational credentials, for example. What are the implications of prioritizing in-Canada versus out-of-Canada French-speaking populations, including for diversity? We would also welcome your input on numbers for this priority, including relative to other selection priorities.

Les considérations essentielles pour le tourisme francophone en situation minoritaire :

- Le niveau de compétence de français et la maîtrise de la langue française parlée et écrite devrait être au niveau NCLC/CLB 7.

- Prioriser les immigrants francophones qui ont déjà de l'expérience de travail en tourisme au Canada et les immigrants francophones ayant une expérience de travail en tourisme dans leur pays dans l'une des catégories les plus en demande : la restauration, l'hébergement, les loisirs et divertissements, ainsi que les services de voyages.
- Augmenter la cible de 4,4 % d'immigration d'expression française en situation minoritaire.

Q13 – Is there any other feedback you would like to provide about selecting Francophone and bilingual candidates in Express Entry?

Augmenter le pointage donné pour les immigrants francophones qui ont déjà en main une offre d'emploi en tourisme.

Other priorities

Q14 – Beyond the proposed priorities, are there any other economic objectives that could be met via category-based selection under Express Entry?

Answer:

The category-based selection process provides an indisputable opportunity to help resolve some of the longstanding skills mismatch and talent shortage issues in the Canadian labour market.

According to CFIB's research report, there is a considerable mismatch between the skill levels of skilled workers who are in Canada as PRs and the skills that small business owners need the most. Whereas almost half of small business owners (46%) are looking for workers with skill level B, workers within this skill level only make up 17% of permanent residents. Similarly, 31% of small employers are looking for workers with skill level C, but these only make up 2% of permanent residents. Instead, the majority of permanent residents (59%) are highly skilled workers with skill level A. However, only 7% of small and medium enterprises were looking for workers with a university degree (skill level A), and 1% wanted to fill management-type positions (skill level O).

Given that 77% of labour force needs are concentrated in skill levels B and C, it is important for governments to realign the immigration system to meet the most pressing needs of small employers.

The category-based selection approach would provide the majority of business operators with more and better options to respond to their staffing shortages -- which are concentrated in skill levels B and C -- through immigration programs.

Thus, it is critical to align the immigration system with labour market needs by analysing labour market data thoroughly and comprehensively.

What's more, there are few programs available for temporary foreign workers in lower-skilled jobs to apply for permanent residency, except for Provincial Nominee Program and the new Agri-Food Immigration Pilot that will be available to certain industries only. As such, it can be difficult for a TFW who has been trained by a business and who has integrated into the community over a period of several years to transition to permanent residency. Therefore, it is urgent and essential to:

- Grant access to all economic immigration categories to workers at all skills level, including trades and semi-skilled occupational categories.
- Restructure the “points system” for immigration to ensure that economic immigrants being welcomed into Canada are filling actual labour market needs by placing more emphasis on those who have already secured a job offer from a Canadian employer.

Q15 – Are there any ways to improve equitable access to opportunities for permanent residence through Express Entry?

Answer:

As noted by THRC in its submission, taking a client-centric approach to the design and implementation process of the immigration system is fundamental to addressing the disproportion impact brought by the pandemic to different equity-deserving groups.

To ensure an equitable access to opportunities for permanent residence by all demographic groups, the government could consider the following initiatives:

- Provide public funded settlement services to vulnerable applicants regardless of their visa status, including undocumented migrants.
- Collaborate with community partners and individuals to provide pro-bono legal and immigration consultation services to the most vulnerable applicants.
- Create guideline with clear, plain language to explain the step-by-step application process. And translate them into major languages spoken by the targeted population of applicants and disseminate them widely to trusted community stakeholders.
- Waive fees and other costs to ensure applicants with financial challenges are eligible for the Immigration Loans Program.

- Establish stakeholder partnerships with organizations that different demographic applicants trust including migrant worker organizations, settlement service provider organizations, religious groups, and trade unions etc. through information sessions and communication campaigns to ensure as many potential applicants as possible are aware of the programs and how to navigate them.
- Implement the application process in a hybrid model to ensure applicants who lack digital skills can access paper-based applications.
- Build the capacity of immigration services and infrastructure of rural and remote communities where temporary agricultural workers often reside, since lack of access to services, test sites, and reliable internet service can add to the time and cost of pursuing a PR application for them.
- Expand the eligible language tests such as Canadian Language Benchmark tests to assess language skills for potential applicants, since the current two language tests IELTS and CELPIP are costly and with limited access locations.
- Provide alternative solutions for applicants who are unable to retrieve required documents from overseas, especially from countries involved in wars.
- Designate more government-approved physicians to conduct immigration medical exams in different geographic locations especially in rural and remote communities.

Learning from the process

Q16 – How has your understanding of category-based selection changed by engaging in this exercise? Please select one of the following options.

- Significantly improved
- Improved
 - No change
 - Decreased
 - Significantly decreased
 - I don't know

Q17 – Are there any aspects that remain unclear?

Not at this time.

Q18 – The online platform facilitated my participation in this engagement process.

- Strongly agree
- Agree
- Neither agree nor disagree
- Disagree
- Strongly disagree
- I don't know

Q19 – What did you like about this engagement process?

The online platform and the consultation form were well outlined and explained.

Q20 – Was there anything you did not like about this engagement process?

Given the complexity of the immigration system and considering the size and scope of the tourism industry in Canada, a more robust communications/awareness strategy of this consultation could have been deployed, and the deadline for submissions could have been longer.

Q21 – Do you have any changes or further recommendations that could support your participation in future years?

A more robust communications/outreach/awareness strategy for such consultations and longer periods before submission deadlines would help ensure that stakeholders across Canada, particularly small organizations representing large sectors, can ultimately compile, synthesize and draft more meaningful input.

Q22a – Do you agree to have your written submission published in whole or in part in subsequent reports?

- Yes
- No

Q22b – [IF Q4=YES] How would you like the material to be attributed in subsequent reports?

- Full attribution – My full name and my organization's name can be published

- Partial attribution by name – Only my full name can be published
- Partial attribution by organization – Only my organization's name can be published
- Anonymized contribution – My comments can be published, but without reference to either my full name or my organization's name