

Strategic Immigration Review

Overarching principles of Future of Immigration

- Immigration policy must be created by and for migrants, with a focus on ensuring rights, dignity and self-determination for migrants and immigrants.
- All migrants - regardless of income or work - should have the right to be with our families as we choose to define them and have them visit or stay permanently alongside us.
- Employers must not have the ability to exploit migrants or determine our future. This includes no tied or sectoral work permits; no time-bound work authorizations; no exclusions on industry of work; no requirement for job offer letter or employer documents or minimum work experience requirements for any permanent residency application.
- Working class migrants must be able to come to Canada with equal rights, which is only possible through permanent residency.
- Canadian education accreditation, and official language test scoring should not determine access to permanent residency.

Federal Workers Program

We propose the creation of a Federal Workers Program through which all working class migrants must be able to come to Canada with permanent resident status. Under current immigration laws, most racialized working class people are only able to come to Canada on study or work permits with little or no access to permanent residency. Those who come as refugee claimants are also often rejected. Many end up working in Canada for many years, and then are forced to leave or become undocumented. The Federal Workers Program reverses this trend, allowing working class migrants to come to Canada with all the rights and protections that permanent resident status provides.

Key elements of the Federal Workers Program should be:

- Established through the Express Entry system, any working class migrant and their families should be able to create a profile and apply for permanent residency in Canada.
- The FWP should maintain work experience as a category in a way that reflects the actual skills of working class migrants in Canada.
 - Work experience must consider points for NOC C & D (TEER 4,5) employment experience in Canada and abroad, as well as seasonal work, gig-work experience, part-time work experience, and work done on a study permit. Work experience need not be paid work experience but can include practical experience, too.
- There should be no job offer letter requirement and no extra points for in-Canada work experience.
- An overall minimum score should be set for applicants - any applicant that meets the minimum requirement should have their applications processed. The minimum points should not exceed

the usual life circumstances of an average temporary foreign worker currently in NOC C & D (TEER 4 or 5) employment.

- Applicants should be issued untied permits while they are awaiting processing of their applications. These open permits must allow applicants to both work and study. Families must be allowed to accompany principal applicants and be able to work or study.
- Once they have created a profile, applicants should be able to seek employment in Canada via the job bank.
- Once workers receive untied permits, they should be able to travel to Canada to work or study along with their families as they await finalization of their permanent residency application.
- There should be no requirement for workers to stay employed for their permanent resident application to be processed.
- Everyone who is in Canada on an untied permit should be granted permanent resident status.
- Applicants should be able to make humanitarian considerations submissions as part of their application regardless of whether they are applying from in-Canada or from outside of the country.

Regularization

- All undocumented people in Canada (without exclusions of any kind) along with their families should be able to apply for a single step permanent residency program;
- All undocumented people must be given work and study authorizations as they await processing of their permanent residency applications. These permits must be valid for the maximum possible length of time such that permits either do not need to be renewed while awaiting a decision or are automatically renewed;
- Applications must be free, and accessible, and the regularization program must be created under the direction of migrant organizations;
- All deportations must be stopped;
- Medical inadmissibility and other inadmissibilities should not be applied; and
- The program must be ongoing so that those who become undocumented in the future can apply; and the entire immigration system must be transformed so that no one becomes undocumented in the future.

Our full proposal is here: <https://migrantrights.ca/resources/regularization-in-canada/>

Temporary Foreign Workers Program

All migrants coming to Canada must do so with:

- Permanent resident status on arrival (regardless of industry of work, TEER, full time or seasonal jobs) so migrants can access basic rights and protections through the Federal Workers Program.
- They must be able to access all the rights and protections that are available to permanent residents.
- They must not be on tied permits or have industry exclusions. Restrictions on work create a fundamental “power imbalance”, as Minister Qualtrough acknowledged in June 2020. Migrants

on tied permits are unable to assert their rights because doing so can mean homelessness, deportation, inability to return to work in Canada, or losing a chance at permanent residency. Sectoral permits are another form of tied permits as they continue to grant power to employers for future permanent residency applications. The exclusion of work in “businesses related to sex trade” puts migrant sex workers at greater risk.

- Migrant workers in Canada on valid work permits should be able to get permanent resident status either through the Federal Workers Program or another program. Those without valid permits should be included in the Regularization program. After their PR applications are submitted, they should be given untied work authorization. Their families should also be allowed to apply for untied work permits and authorization to study so they can be re-united. These permits and study permits should remain valid until their PR is issued.
- Migrant workers not eligible for provincial/territorial health programs must be covered under the Interim Federal Health Program.

In addition:

- Create a whistleblower permanent residency program - any migrant worker, including those on study permits, and their co-workers who complains about exploitation must be given permanent residency so as to stop employer abuse. The current Open Work Permit for Vulnerable Workers (OWP-VW) system is not working. It is impossible for a migrant worker to apply for this permit without support from legal case workers, which is untenable for most. The burden of evidence is such that most workers are unable to apply. The permit is non-renewable with no access to permanent residency, meaning that migrants have no choice but to return to the exploitative jobs and employer restricted work permits they were fleeing in the first place. Furthermore, most employers are unwilling to apply for LMIA for workers who have spoken up against abuse.
 - If the OWP-VW system continues, it must be streamlined to allow migrants to apply on their own, and in their own language; workers must be provided transition support by way of income and housing while applying; the permits must be untied and renewable with guaranteed access to permanent residency; and migrants on other work and study permits in a vulnerable situation must be allowed to apply.
- Overhaul the Seasonal Agricultural Workers Program (SAWP) to end the practices of blacklisting (all workers must have right of first refusal to return); ability for workers to stay in Canada in between seasons and get work permits from inside Canada, untied work permits and permanent resident status on arrival.
- End and ban all forms of repatriations, including medical repatriation. Mechanisms must be created for migrant workers who have been coerced to leave Canada to return with permanent resident status.
- Make the public policy to allow migrants on visitor status to transition to work permits permanent. Work authorization must be untied. Tying workers to employers because of their status enables employer abuse.
- Work with Employment and Social Development Canada and provincial authorities to overhaul the compliance regime by creating a new enforcement unit of federal, provincial authorities and migrant rights organizations. The enforcement unit must assess working and living conditions

prior to all temporary foreign workers arrival (including migrant care workers). A 24-hour accessible telephone hotline and web interface must be created for workers to confidentially and anonymously make complaints about employer non-compliance in their own languages, or through third parties such as migrant worker support organizations, including through photos and videos. The unit must respond to every complaint. The enforcement division must do swift, unannounced inspections on employers where complaints have been made, in coordination with local public health officials and always include federal and provincial labour officials. During unannounced inspections, workers must be interviewed in their own language, individually and separately from other workers and employers unless workers specifically request an off-farm support person to participate with them. Non-compliance should be met with fines that will incentivize compliance. In addition, specific measures must be enacted to ensure workers are appropriately compensated where employers put their lives at risk through non-compliance. Workers must be supported to make labour complaints. Results of inspections must be provided to all workers, as well as to those that made complaints if they provided their contact information. All complainants must be given permanent resident status.

- Work with ESDC to implement enforceable national housing standards for all temporary foreign workers as recommended in our November 2020 submissions to the consultation on migrant worker housing standards.

Economic Immigration Streams

- Transform the Agri-food Immigration Pilot: The program as designed excludes most agricultural workers. The AFIP should allow Seasonal Agricultural Workers as well as workers in any industry including fisheries to apply, the education and language requirements must be removed, and workers must be allowed to apply without a job offer from an employer - this requirement only gives employers unchecked power to exploit workers with the promise of permanent residency. The 2,750 cap must be removed. Allow workers with work experience to apply, even if they do not have valid work authorization and valid temporary status.
- Transform the Home Child Care Provider and Home Support Worker pilot programs: 1 in 3 migrant care workers lost their jobs during COVID-19, and are therefore unable to meet the work requirement necessary to apply. Those inside Canada are unable to apply because it is impossible to meet educational accreditation and language criteria requirements. All careworkers in Canada should be able to apply for permanent residency without a cap, without needing to show Canadian education accreditation or official language scores and without proving 12 months of work experience or a job offer letter. If the work experience requirement is kept, it should only be 12 months and care workers should be allowed to combine experience in child care, elderly care and high medical needs care; as well as work done without valid work authorization. All applicants for PR must receive untied work permits immediately (no longer than 30 days from the application) and their families should be allowed to join them and be able to work or study. Work and study authorization should remain valid until PR is issued. Allow workers in Quebec to apply.
 - Thousands of care workers have PR applications stuck in a processing backlog, in some cases for over 5 years. Careworkers stuck in the backlog are struggling to get permits,

risk losing access to health care, and remain in limbo about their futures, separated from their families. We urge the immediate clearing of the backlog. All who have pending applications should be given untied work permits. Their families should also be allowed to apply for untied work permits and study authorizations so they can be re-united.

These work permits and student permits should remain valid until their PR is issued.

- Change the work requirements in the Canadian Experience Class and lower the CRS score by ensuring a fair metric on which scores are calculated: Currently most migrants in gig work, low-waged work, or part-time work, as well as those with work experience gathered while on a study permit or while applying for refugee and humanitarian considerations, or other untied work permits are excluded from applying for the Canadian Experience Class. The requirement for one year of high-waged (so-called 'high skilled') work experience excludes racialized, poor and working people, even as those same workers have been essential to ensuring our society continues to function during a pandemic and global economic downturn. We urge you to allow all migrants with any work experience at any level in Canada to apply, including those without valid immigration status at the time of application and for work done on any immigration permit, or without immigration status.
- Atlantic Immigration Program: Allow all migrants in the Atlantic region to apply; remove the employer designation program and allow those working for any employer to apply; allow workers without valid temporary status or work permits, in TEER 5, in seasonal work and self-employed to apply; remove the requirement for Canadian accredited education and the requirement for language testing scores.
- Provincial Nominee Programs (Alberta, British Columbia, Manitoba, New Brunswick, Newfoundland and Labrador, Northwest Territories, Nova Scotia, Ontario, Prince Edward Island, Saskatchewan, Yukon): Remove requirements for a job offer letter and remove employer participation in the programs; education accreditation, minimum language test score requirements. Allow workers with 1,560 hours of work in the previous 5 years to apply. Remove financial eligibility requirements. Allow migrants of any age to apply, and allow migrants who worked without valid work authorization, and those not on valid temporary status to apply including rejected refugee claimants and undocumented residents. Clear any backlogs and speed up processing.
- Ensure Bridging Open Work Permits (BOWP) for permanent residency applicants: Migrants who applied through the Live-In Caregiver Program or the Interim Pathway for Caregivers, as well as other permanent residency streams, have been waiting months, some for over a year to get BOWPs. Some migrants have applied for PR but were unable to apply for BOWPs before their permit expired and have visitor status or become undocumented, which means they are unable to work. We urge you to issue BOWPs to all permanent residency applicants regardless of stream or length of current permit.
- Allow migrants to fix errors in permanent residency applications: Currently many applications are returned or turned down for minor errors like missing a single signature by hand, document or translation. Instead migrants should be given the opportunity to remedy errors or provide missing documents. Note that IRCC has often said documents are missing when in fact they were attached with the application. This can delay application processing for years, during which time migrants lose status or income, or their children age out of the family sponsorship

age restrictions. The immigration system must be reformed to support migrants to apply rather than punishing them for minor errors.

- Allow migrants to sponsor their family members even if they were not included in the original application.

Changes to International Mobility Program

- Make post graduate work permits renewable: Many migrant student workers are not able to gain the work experience required to apply for PR within the limited duration of the 1 - 3 year work permits they are granted. That the post-graduate work permit was made renewable three times over the course of 2021-2023 clearly demonstrates the need to make it permanently renewable.
- Allow students who graduated from private colleges to apply for post-graduate work permits.

Family Reunification

- Being with our loved ones is a fundamental human right and we urge you to make changes so that migrants are able to have their families arrive with them, stay with them and visit them if they so choose regardless of income, TEER level or NOC code. The newly announced Open work permits to family members of temporary foreign workers excludes working class migrants.
- Ensure access to untied work permits, study authorization and universal healthcare for family members on super visas. Many of them are working, but forced to do so without labour protections and therefore face greater exploitation.
- Expand family reunification to include extended and adopted family members, including same-sex partners, adult siblings and cousins. We urge you to allow migrants to determine who their family members are.

Detentions and Deportations

- COVID-19 saw a reduction in immigration detention in some regions with no negative impact on communities, demonstrating that detention is unnecessary, unfair and arbitrary. We urge you to end detentions, without resorting to in-community detention practices like electronic monitoring bracelets or voice recognition check-ins. If detention is maintained in extremely exceptional circumstances, we urge you to:
 - End arbitrary detention (unreviewable decisions to detain on identity or suspicion of inadmissibility, and provisions relating to “Designated Foreign Nationals”)
 - End the detention of children or family members including de facto guardians.
 - Rather than relying on detention and other control measures, seek to ensure compliance with immigration rules by providing comprehensive case support, including giving individuals good information and presenting them all the options.
 - Ensure access to good legal representation (for example through duty counsel).
 - End detention in provincial jails in coordination with territorial and provincial partners, but do not move migrants outside of their communities, into federal prisons or expand federal immigration holding centres.

- Improve access for people in detention to NGOs, services, visits, internet, telephone calls, etc.
- Improve access for people in detention to mental and physical health care.
- 2020 saw more deportations than the previous five years, even as many countries around the world are still facing serious COVID-19 crises. We urge you to immediately halt all removals.

Humanitarian Program

- Transform the in-land refugee processing system: Hearings for inland refugee claims are decided by a board member in an “inquisitorial process” where the board member acts as judge and prosecutor. We urge you to fix the in-land refugee system with direction from refugee organizations focusing on supporting refugee claimants to access refugee status rather than an adversarial system to “determine” if someone is a refugee. The Safe Third Country Agreement must be rescinded, and claimants traveling from the US or who have made refugee claims elsewhere must be able to apply. All refugee claimants must be allowed to travel while awaiting a decision, including to countries of origin and Safe Third Countries; there must be no cessation of refugee status for visiting countries of origin.
- Transform the Government Assisted refugee resettlement system: A target of only 15,250 government assisted refugees is set for 2025. This trend must be reversed, Canada must set a target of 0.25% of Canada’s population as its government assisted refugee target. We further urge you to expedite and expand the refugee resettlement process, resettle refugees beyond those determined by the UNHCR and accept refugees who are still in their country of origin. Further changes must be made under the direction of refugee and migrant organizations.
- Transform the Humanitarian and Compassionate (H&C) application system: The H&C process must be overhauled focusing on supporting migrants to gain permanent residency on humanitarian grounds rather than an adversarial process. H&C applications must be made free, and deportations must be halted during the processing of the H&C application. If deportations continue, then H&C claims must be expedited for those outside of Canada and their applications be given full consideration despite their presence in their country of origin. Currently, the vast majority of overseas H&C applications are refused on the basis that the applicant is now protected and safe in their country of origin after being deported.
- Ensure access to permanent residency and family reunification: Currently, once accepted as refugees, the processing times for permanent resident status is almost two years. Family reunification for people accepted as Convention refugees in Canada reportedly takes about 39 months. We urge you to provide permanent residency immediately to all refugees and ensure family reunification.

International Student Program

- End discriminatory treatment at visa offices in different parts of the world, and create mechanisms to ensure all applicants are treated the same.
- Permanently end the 20 hour work rule for study permit holders.
- Allow co-op work authorization without extra permits.

- Work with provincial authorities to implement a system that proactively regulates partnerships between public and private education institutions as well as education agents and recruiters; and implement mechanisms that ensure tuition fees, rate of fee increases and in-school supports are equal to domestic students’.
- Create protections for vulnerable and destitute migrant student workers through the creation of a vulnerable student untied work permit. These permits must be renewable and allow for students to return to school should they choose to. All work experience completed on these permits must count toward permanent residency.

Protections for Migrant Sex Workers

- Repeal Immigration and Refugee Protection Regulations (IRPR) that prohibit working in sex work related business: Immigration, Refugee and Citizenship Canada (IRCC) to heed the recommendations of the [Report of the Standing Committee on Justice and Human Rights](#) and immediately repeal ss. 183(1)(b.1), 196.1(a), 200(3)(g.1) and 203(2)(a) of IRPR.

Inadmissibility

- Repeal Section 38.1.c of Immigration and Refugee Protection Act (IRPA): Canada’s immigration system has a history of discriminating against migrants according to their medical needs, causing fear, stress, and anxiety in those who are impacted. Denying permanent resident status based on health status reinforces health inequities in our communities and disproportionately harms already marginalized groups, such as patients with HIV and people with disabilities. In some cases migrant workers and undocumented people have been injured in Canada at work, or have been unable to access health coverage, including mental health supports, and then been deemed medically inadmissible. Ensuring full and permanent immigration status, with no medical inadmissibility, contributes to keeping communities strong and healthy. In December 2017, the Standing Committee on Citizenship and Immigration recommended that “That section 38(1)c of the Immigration and Refugee Protection Act and the exemptions to it be repealed; that the Governor in Council repeal all corresponding regulations; and that Immigration, Refugees and Citizenship Canada repeal all corresponding policies and guidelines.”
- Repeal Section 34(1)(f): Officials use discretionary authority to deem a person as supporting organizations that there are “reasonable grounds to believe engages, has engaged or will engage in” acts of subversion or terrorism even when the individual is not considered to have been violent themselves. This includes when ‘subversion’ is directed against oppressive military dictatorships Canada itself denounces as human rights abusers.¹ This section has been routinely used to target individuals for political activism motivated by principles of justice and human rights². In other cases, it has been used to exclude individuals who were forced to be part of organizations against their wishes (for example, child soldiers)³. One of Prime Minister

¹ Eg Augusto Pinochet’s dictatorship in Chile, [Pizarro Gutierrez v Canada \(Citizenship and Immigration\)](#), 2013 FC 623

² Behrens, Matthew (2014). [Fight for Freedom? You’re Inadmissible to Canada](#)

³ [Ismail v. Canada \(Citizenship and Immigration\)](#), 2016 FC 1294; [Kanendra v. Canada \(Minister of Citizenship and Immigration\)](#), 2005 FC 923

Trudeau's first actions was to grant Salvadoran refugee Jose Figueroa an exemption from this inadmissibility⁴. A narrower inadmissibility section can be put in place following consultations.

- Transform Section 40: Many migrants are deemed to have misrepresented because of inadequate legal representation or for withholding information they were not aware that they had to share. Even if the misrepresentation is not from the migrant (i.e. it's from unethical legal counsel), the migrant pays the price of inadmissibility. For example, a migrant care worker was deemed to have misrepresented because she did not declare her work outside of her employer-dependent work authorization in her permanent resident status application. She had taken on this second job on an ad-hoc basis to pay for extra costs arising from a child's serious illness in her sending country. In a recently publicized case, over 100 Somali youth have had their refugee status vacated for not providing the Kenyan travel documents they used to first come into Canada. However, the government of Canada knows that they are in fact Somalis because they all have valid Somali passports and some are being ordered deported to Somalia.
- Repeal Section 36 and 37: Prime Minister Justin Trudeau instructed the Minister of Justice and Attorney General of Canada in his mandate letter to "advance strategies to address systemic racism and the disproportionate representation of Indigenous Peoples, as well as Black Canadians and members of marginalized communities in the criminal justice system"⁵. Excluding migrants for criminal inadmissibility would run contrary to this mandate and only serve to reinforce their marginalization. Denying immigration status after a person has served their criminal conviction - sometimes decades later and under a different criminal justice system - is twice the punishment - and does not meet the basic test of fairness and justice. Criminal behaviour is assessed on its own terms and should not have any bearing on access to basic rights and residency (through permanent resident status), any more than it does for citizens. Racial discrimination and anti-poor behaviour by police and the courts has been well-documented in Canada. This includes:
 - Many racialized migrants, particularly without work authorizations, are criminalized for acts of desperation related to living in extreme poverty with few or no options to survive because they are largely excluded from the social safety net. This can include being criminalized for shoplifting food, selling marijuana or sex, sleeping in prohibited public areas, or otherwise criminalized behaviour that are crimes of last resort. In some cases, migrants have been criminalized even for driving⁶.
 - Racist policing means that migrants are targeted by police.⁷ Low income means that many migrants cannot get bail or are unable to secure good legal representation. Many plead guilty to crimes simply to be released from pre-trial imprisonment. Often, duty lawyers advise them to do so without explaining the immigration consequences.⁸

⁴ CBC News (2015): [Jose Figueroa leaves church sanctuary after deportation order withdrawn](#)

⁵ [Minister of Justice and Attorney General of Canada Mandate Letter](#) (2021)

⁶ Walker v. Canada (Public Safety and Emergency Preparedness), 2010 CanLII 62709

⁷ The Ontario Human Rights Commission reported on how in addition to race and related grounds, many experience racial discrimination based on their dress and appearance (ex. Wearing a hijab), accent, being an immigrant or newcomer, having a racialized name (ex. Having an Arabic name), and for association with others (ex. Having racialized friends) — many migrants identities display an intersection of these grounds, [Under suspicion: Research and consultation report on racial profiling in Ontario](#) (2017), pg 22; Canadian government research has described: "[c]ertain neighbourhoods receive labels or designations such as 'improvement areas,' 'priority neighbourhoods,' or 'at-risk neighbourhoods.' These tend to be marked by high levels of poverty, crime, and higher proportions of racialized/newcomer residents. As part of a strategy to reduce the level of crime in these neighbourhoods, law enforcement have adopted 'proactive' or 'preventative' policing, which results in these neighbourhoods being heavily monitored and patrolled." This over-policing is linked to anti-Black racism, [Black Youth and the Criminal Justice System: Summary Report of an Engagement Process in Canada](#) (2022).

⁸ See Ranyuk v Her Majesty the Queen, 2020 ABQB 73.

- Multiple run-ins with the judicial system and minimum sentencing requirements means that even those who engage in so-called “petty crimes” are sentenced to over six months, and thus deemed to have met the test of “serious criminality”.⁹
- Young migrants, including Black refugee youth, social groups, friend circles and community connections are termed “organized criminality” by policing.¹⁰

Settlement Services

- All migrants and their families including those on work and study permits, as well those who are undocumented should be able to access all settlement services including but not limited job placement, housing and English or French language classes. These services should be funded.
- Additional funding should be provided for family settlement programs to allow transition support for families who suffered from long separation.

Coordination with provincial and territorial partners

- Work with migrant groups and provinces and territories to increase wages and ensure proactive employment standards enforcement: Migrant workers do not have direct enforceable rights under existing federal rules. There is no legislation that governs enforcement and no court or legal process workers can turn to to denounce violations of their rights. Neither is there any meaningful mechanism for Employment and Social Development Canada (ESDC) to ensure workers receive remedies for violations of their rights.
- Work with provinces and territories to ensure access to healthcare for all migrants
- Work with provinces and territories to guarantee access to free legal representation for the purposes of immigration and rights enforcement to all migrants, regardless of status.
- Work with provinces and territories to end differential tuition for international students; and allow international students to pay the same fees as domestic students.
- Fund legal aid programs for refugees and immigration in provinces or territories who refuse to fund such services.

Migrant Rights Network is Canada’s largest migrant-led coalition of 40 organizations in 8 provinces which are made up of tens of thousands of migrant members including farmworkers, domestic workers, current and former international students, refugees and undocumented people.

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⁹ Bot v Canada (Public Safety and Emergency Preparedness), 2013 CanLII 87227 at paragraph 37.

¹⁰ [Canadian government research](#) suggests that the anti-Black policy of over policing neighbourhoods with higher proportions of racialized/newcomer residents is partly responsible for the widely different life outcomes between Black youth and non-Black youth, [Black Youth and the Criminal Justice System: Summary Report of an Engagement Process in Canada](#) (2022). The Commission des droits de la personne et des droits de la jeunesse Québec has shed light on the fact that Young Black community members are most often associated with street gangs, [Racial Profiling and Systemic Discrimination of Racialized Youth](#) (2011), pg 28; The Ontario Human Rights Commission has discussed how in addition to race and related grounds, many individuals believe they have experienced racial profiling or other forms of racial discrimination based on their being a newcomer and/or hanging out with people in a group (this is particularly the case for racialized and Black youth), [Under suspicion: Research and consultation report on racial profiling in Ontario](#) (2017), pg 22; Research in Quebec has also shown that young Arabic community members (aged 15 to 24 years) are more than 4 times more likely to be arrested than a white youth of the same age. Victor Armony, Marian Hassaoui, and Massimiliano Mulone, [Les interpellations policières à la lumière des identités racisées des personnes interpellées - Analyse des données du Service de la Police de la Ville de Montréal \(SPVM\) et élaboration d'indicateurs de suivi en matière de profilage raciale](#) (2019), pg 10.