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**May 2, 2024**

**Rt. Hon. Justin Trudeau  
Prime Minister of Canada  
80 Wellington Street  
Ottawa, Ontario, K1A 0A2  
[justin.trudeau@parl.gc.ca](mailto:justin.trudeau@parl.gc.ca)**

**Hon. Marc Miller  
Minister of Immigration, Refugees and Citizenship  
House of Commons, Ottawa, Ontario, K1A 0A6  
[Marc.Miller@parl.gc.ca](mailto:Marc.Miller@parl.gc.ca), [Minister@cic.gc.ca](mailto:Minister@cic.gc.ca)**

**Cc: Migrant Rights Network - [letters@migrantrights.ca](mailto:letters@migrantrights.ca)**

**RE: Regularize All Undocumented People and Ensure Permanent Resident  
Status for All Migrants**

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Dear Prime Minister Trudeau and Minister Miller,

The Inter Clinic Immigration Working Group (“ICIWG”) is a network of lawyers and community legal workers from community legal clinics across Ontario. We assist disadvantaged, vulnerable, and low-income individuals with their immigration needs. ICIWG has been active for over 25 years and includes a wide range of members within and outside the GTA. Collectively, we have firsthand experience and knowledge working with persons who have precarious or no immigration status in Canada.

We previously wrote to you in 2022 recognizing the crucial opportunity the Prime Minister presents with his mandate letter to Minister Fraser requesting the creation of a regularization program for undocumented migrants. We were strongly encouraged by the unanimous parliamentary motion that asked the Immigration Minister to create a plan to give permanent residency to workers. This is a promise that has been repeated many times, and most recently, the Minister promised to bring a proposal to Cabinet in the Spring of 2024. By exploring the path to regularization, the liberal government is taking steps in the right direction, and ICIWG hopes to see a plan put into place that is completely inclusive.

Time is of the essence. The migrant care worker program is expiring on June 17, and unless replaced, thousands of migrant women will become undocumented. Already, many of them cannot apply for permanent residency because of impossible-to-achieve language testing and educational accreditation requirements. Landlords are raising rents beyond reach, grocery monopolies are making it harder to put food on our tables, and lobbyist-driven governments are privatizing healthcare and education.

A rare opportunity is presented before you whereby a choice can be made to create a program that can provide equal rights for all by extending permanent residence to 1.7 million migrants, including 500,000 undocumented migrants, or developing a partial, small and exclusionary program that will only give rights to a few and deny them to most. Non-status people are part of our communities. They are our neighbors, friends, parents, and co-workers, and they live under constant threat of deportation and detention, as well as have either no-or-limited access to education, basic healthcare and rights at work. Ensuring a fully inclusive regularization program will help hundreds of thousands of individuals avoid poverty, and strengthen our communities.

For these reasons, we call for the regularization of all undocumented people without exception and permanent residence for all migrants, particularly those in low-waged jobs. Regularization of status is the most direct way of allowing non-status individuals to live dignified lives, and have security for their families. This is why migrants and over 483 organizations are calling for regularization and for full and permanent immigration status for all residents.

We ask that the Canadian government ensures equal rights for all by:

- Immediately creating a comprehensive and inclusive regularization program that allows all undocumented people to apply for permanent resident status immediately.
  - No caps
  - No restrictions by industry of work or geography
  - No two-step immigration which only gives temporary work permits
- Creating an interim program for migrant caregivers in Canada to apply for permanent resident status without educational accreditation and language test score requirements;
- End migrant exploitation by ending tied work permits and hours of work limits for international students; and ensure permanent resident status for all working class people in Canada today.

We urge you to adopt the principles proposed by the Migrant rights Network, which are expressed in a set of proposals on both regularization and migrant care workers. These proposals are attached to this letter.

The current government has constantly reiterated its commitment to liberal values, and ensuring that regularization is a broad and inclusive program strongly adheres to these values. Since 1960, Canada has adopted a number of regularization programs, which all were proven too small and exclusionary. Today's liberal government has an opportunity

to correct historical injustices by adopting an inclusionary and comprehensive regularization program that symbolizes and reflects its true values.

This is important and tied to our work as members of ICIWG. We work with some of the most marginalized and vulnerable members of our society, many of whom do not have status. A regularization program is important to us because:

- **It is part of ending systemic racism and ensuring gender equality:** Undocumented people and migrants are mostly racialized, low-waged people, often women. Ensuring rights and access for them is part of implementing anti-racist policy and gender equality.
- **Lack of regularized status increases vulnerability and exposes workers to the risk of abuse.** For women, this also increases the risk of gender-based violence where employers and abusers will take advantage of women who are afraid to report or leave for risk of being reported.
- **Ensuring improved labour conditions:** Employers of migrant workers, international students and undocumented workers threaten them with deportations to stop them from asserting their rights. This abuse results in overall worsening of working conditions in the labour market. While bad employers prosper, good employers who may be unable or unwilling to hire workers informally or for cash payments are disadvantaged.
- **Ensuring public health:** Migrants often do not access healthcare until it is absolutely necessary due to the costs. By the time they do, their health conditions are much more complicated, and the burden on the healthcare system is much higher.
- **Creating more effective social policy:** Currently, there are no reliable statistics on undocumented people in Canada. An inclusive regularization program will ensure that non-status people enter into everyday life, allowing for more informed and effective social policy to be created.
- **Growing the economy at greater rates than cost of processing or settlement services:** Most undocumented people pay taxes but their employers, many of whom are very profitable businesses, do not pay statutory remittances. Regularizing 500,000 undocumented people will increase employer CPP and EI contributions by at least \$1.1 billion, just in the first year. As undocumented people achieve stability through permanent residence, they will lay down roots, purchase assets of greater value, and spend more on Main Street. A recent US National Bureau of Economic Research paper by renowned economists George Borjas and Anthony Edo shows that the economic benefits of effective regulation programs can contribute to substantial improvements to the economy. These economists looked not only at how the lack of status restricts labour market options for undocumented people, but at the monopsony power companies have in the undocumented labour market. Economic inefficiencies are created that not only reduce wages and hiring in the undocumented labour market but in localized labour markets. Companies in these sectors hire fewer documented and undocumented workers and at lower wage rates. These economists analyzed the economic impact of France's 1981 program that regularized immigration status for 131,360 undocumented workers or 1% of France's population. This empirical

analysis found that this regularization program increased French per capita GDP by 1%. If we apply this methodology to Canada, it would mean as much as \$28 billion in increased economic activity per year.

- **Creating labour mobility to address shortages where they exist:** Undocumented people live and work here. Many are in cash-based jobs, or are under or unemployed. Migrant workers are on employer-tied permits or need to stay in jobs to get permanent resident status. Ending tied permits, removing hours of work restrictions, regularization undocumented people and ensuring permanent resident status for all will increase migrant labour mobility, unlocking their skills and experience enabling them to fill the skills gap and labour market shortage.
- **Building on best practices around the world:** Between 1996 and 2008, 24 of the 27 EU Member States implemented regularization programs, and some several times. An estimated 5.5 to 6 million people were regularized in that time. The largest programs were the Italian 2002 program that regularized 634,000 people and the Spanish 2005 program that regularized 578,375 people. Last year, Ireland regularized most undocumented people in the country who met a basic residency requirement.
- **Responding to a growing voice:** Almost every major civil society, labour, health and environmental organization has joined our call for full and permanent immigration status for all - nearly 500 organizations. Major organizations from across Canada have also written letters to PM Trudeau supporting our regularization proposal. On September 17, 2023, we organized demonstrations in 15 cities in Canada, which were endorsed by over 200 organizations.

The Inter Clinic Immigration Working Group is committed to helping vulnerable individuals with their legal needs to better facilitate their transition towards a fuller and safer life. We therefore urge you to seize this opportunity and ensure that a new regularization program is robust and inclusive so that there can be status for all.

Thank you for your time and consideration.

Sincerely,

**Inter Clinic Immigration Working Group (Ontario)**

*Nadia Nadeem*

*Manning*

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