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May 7, 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  
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Dear Prime Minister Trudeau and Minister Miller:

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

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The South Asian Legal Clinic of Ontario (SALCO) is a not-for-profit legal aid clinic that was first established in 1999. In September 2007 SALCO was given permanent legal clinic status by Legal Aid Ontario. SALCO's mandate is to provide access to justice for low-income South Asians in Ontario. As a specialty clinic funded by Legal Aid Ontario, SALCO provides advice, brief services and/or legal representation in various areas of law including immigration and employment law. SALCO has worked with thousands of migrants in Ontario on issues of workplace abuse, loss of immigration status, housing and income maintenance. SALCO's mandate also includes law reform projects, community development initiatives, and public legal education to advance systemic change that improves outcomes low-income and racialized communities across Canada.

In December 2021 PM Trudeau made a mandate letter commitment asking the Immigration Minister to create a "regularization program" for undocumented migrants. That promise has been repeated many times, and most recently the Minister promised to bring a proposal to Cabinet in the Spring of 2024. The migrant care worker program is expiring on June 17, and unless it is replaced thousands of migrant women will become undocumented.

As a clinic that works exclusively with low-income clients we have been witness to the current financial circumstances that have forced our migrant worker clients into a deep level of poverty, struggling to survive. We have repeatedly noted in submissions to

governments and participation with the National Advisory Council on Poverty, that having no or precarious immigration status makes access to supports and services almost impossible for many migrants, making poverty in these populations devastating. In addition, there is growing hateful and xenophobic vitriol hurled against racialized migrants, who are being scapegoated as the cause of high rent, no jobs for “Canadians”, and higher grocery prices.

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. As Canada embarks on its North American Tripartite Agreement for Equity and Racial Justice, it must take action to support migrants by:

- Immediately create a comprehensive and inclusive regularization program that allows all undocumented people to apply for permanent resident status immediately with no caps, no restrictions by industry of work or geography, and no two-step immigration which only gives temporary work permits;
- Create an interim program for migrant caregivers in Canada to apply for permanent resident status without educational accreditation and language test score requirements; and
- 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.

The benefits of a regularization program for Canada are significant:

- As noted above, regularization will advance the goal of achieving race and race-gender equity;
- SALCO, though Colour of Poverty – Colour of Change as also repeatedly noted that 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;
- Regularization will reduce workplace exploitation for workers around Canada;
- Regularization is consistent with what is happening globally. 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; and

- Regularization is consistent with Canada's policy of climate change - We must take responsibility for climate migrants: Climate change has caused a 25 per cent increase in economic inequality between the richest countries and the poorest. Canada is one of the world's largest greenhouse gas emitters by population. The mass degradation of natural resources, ecology, and species extinction connected to development projects led by Canadian companies has led to destruction of land-based ways of life, and mass impoverishment of people in the Global South, shrinking economic opportunities for everyone and creating the conditions for migration to Canada. Many migrants, on work, tourist or study permits, refugees and undocumented people, are here because of climate displacement, not just those from mass weather events. Giving equal rights to migrants is part of paying off Canada's climate debt.

**We endorse and urge you to adopt the Migrant Rights Network proposals on regularization and for migrant care workers, which provide the roadmap to achieve these legislative changes and definitive action towards equity for these most vulnerable populations.**

Yours Truly,

**SOUTH ASIAN LEGAL CLINIC OF ONTARIO**



**Shalini Konanur**  
**Executive Director / Lawyer**

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