

C-12 BRIEF TO THE STANDING COMMITTEE ON CITIZENSHIP AND IMMIGRATION

The **Migrant Rights Network** is Canada's largest coalition of migrant-led organizations representing farm and food workers, care workers, international students, and undocumented people. Over 300 civil society organizations have joined us in calling for the withdrawal of this legislation.

Bill C-12 would grant discretionary powers to cancel immigration documents en masse without due process - a power that was taken away from the government in the early 20th century. C-12 would violate refugees' right to seek protection with an arbitrary one-year bar on claims that goes against international norms. The Bill would also increase the risk of harm through information sharing. **C-12 would not improve the integrity of the immigration system but instead undermine it, by introducing discriminatory and dangerous powers that will certainly be challenged in court and will not resolve the backlogs or fairness issues that plague Canada's immigration system.**

We urge the Committee to recommend the immediate withdrawal of Bill C-12.

PART 7: UNCHECKED AND DISCRIMINATORY MINISTERIAL POWERS

Our gravest concern is Part 7, which would grant sweeping authority to the Governor in Council to cancel, suspend, or modify immigration documents and applications en masse "in the public interest."

This would deny people the right to individualized assessment and due process. The Minister of Immigration suggested at CIMM that individuals could challenge these decisions directly to the Governor in Council - a process that neither exists, would not be accessible, and does not constitute meaningful appeal.

Furthermore, "the public interest" is intentionally not defined to allow "maximum flexibility." This risks Part 7 being used in politically motivated and discriminatory ways, on the bases of country of origin, language, socioeconomic status, and other grounds protected under the Charter. [An internal memo confirmed that Part 7 would allow the](#)

[government to address "country-specific" fraud concerns](#), which could be challenged in court like the [Designated Countries of Origin list which was ruled discriminatory by the Federal Court in 2015](#).

IRCC already has powers to address fraud and system errors, and has increased detection over the last year by adding resources.

The government claims these powers would only be used in "exceptional circumstances" such as pandemics - however, in 2020 when COVID-19 was declared a pandemic, the government was able to take necessary measures without such a power.

Part 7 would open the door to discrimination permanently for all future governments. **For those of us living and working in Canada without citizenship, Part 7 means our lives can be upended at any moment based on who we are, not what we've done.**

PART 5: INFORMATION SHARING PUSHES MIGRANTS UNDERGROUND

Part 5 expands IRCC's authority to share private information with other federal, provincial and municipal government agencies, including crown corporations and foreign governments, with few limitations. This poses serious risks to the safety and privacy of migrants, particularly those who have sought protection from those same foreign states.

Immigration information could be shared with service providers including housing and health authorities, police and security agencies, potentially fuelling abuse. For example, Alberta has proposed to deny services to non-citizens and require citizens to display their status on government IDs, exposing anyone who lacks citizenship status to discrimination.

Such information sharing would multiply migrants' experiences of exploitation and inhibit their ability to access critical services without fear of deportation. Migrants asserting labour rights at provincial Ministries of Labour would risk having information shared with federal immigration enforcement. Bill C-12 would force people deeper into the shadows where exploitation thrives.

PART 8: BAR ON REFUGEE CLAIMS VIOLATES INTERNATIONAL NORMS

Part 8 bars refugee claims made more than one year after first arrival in Canada, forcing claimants into the Pre-Removal Risk Assessment process instead of a full hearing at the Immigration and Refugee Board.

Canada's refugee system has one fundamental principle: individual assessment. Part 8 abandons this by setting an arbitrary time limit unrelated to the need for protection, which is why international norms do not set such limits.

[On October 31 2025, the Canadian Press reported on Asya Medea, a trans woman who arrived in 2018 on a student visa.](#) Eighteen months later, she filed a refugee claim because Turkey had become increasingly dangerous for LGBTQ+ people. She was approved in 2020 and now has permanent residency. Bill C-12 would have denied Asya an IRB hearing.

PRRA is not an adequate alternative. Approval rates are only 6%, compared to 60% at the IRB. Unlike IRB hearings, PRRAs offer no oral hearings, have severely limited appeal rights, and are reviewed by bureaucrats rather than trained adjudicators.

PART 8: ELIMINATION OF 14-DAY SAFE THIRD COUNTRY EXCEPTION

Part 8 eliminates the 14-day exception for asylum seekers entering from the US between ports of entry.

The Safe Third Country Agreement is founded on the fiction that the US is safe for asylum seekers. Under current US policies, detention centers subject refugees to harsh conditions, family separation, and expedited deportation to countries where they face torture.

The government says C-12 responds to US demands about migrants crossing from Canada into the US. But C-12 would only punish migrants crossing *from* the US *into* Canada.

C-12 IS ABOUT SCAPEGOATING, NOT SOLUTIONS

In the last two years, migrants have been blamed for the housing crisis, overburdened healthcare systems, and youth unemployment—despite the lack of evidence tying immigration to these problems. These are crises caused by decades of underinvestment and policy failure.

RBC estimates that recent reductions to temporary residents and slower permanent residency inflows will reduce government revenues by a cumulative \$50 billion over five years starting in 2025. Migrants pay taxes and contribute to social services for years without receiving benefits—we underwrite Canada's social safety net.

At a time when anti-immigrant sentiment is rising globally, Canada must reject scapegoating. Migrants build this country. Yet we are denied the stability and equality that permanent residence provides.

Canada must implement comprehensive regularization and end the temporary worker programs that breed exploitation. Instead of focusing on numbers, we must focus on the rights and equality of migrants, and that is only possible through permanent resident status for all.

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