

Open Letter: Canada puts refugee claimants at risk with Bill C-2

The Right Honourable Mark Carney, Prime Minister of Canada
Honourable Gary Anandasangaree, Minister of Public Safety
Honourable Lena Metlege Diab, Minister of Immigration, Refugees and Citizenship

June 12, 2025

Right Honourable Prime Minister and Honourable Ministers,

We are writing to you as a coalition of civil society groups from across Canada to express our deep concern that your government is putting refugee claimants, immigrants and migrants at risk with [Bill C-2, The Strong Borders Act](#).

We call on your government to withdraw Bill C-2 and withdraw from the Safe Third Country Agreement between Canada and the United States of America.

Bill C-2 erodes the rights of refugee claimants and migrants to due process and access to justice. The proposed changes can put them at grave risk.

Your government has introduced the Bill as a measure to strengthen border security, combat organized crime, stop the flow of drugs, and tackle money laundering. Your government has also emphasized the need to move quickly on these actions in the face of external threats to the safety and security of Canadians.

These omnibus changes to Canada's immigration and refugee law will not improve Canada's security and keep the illegal drug trade away. The Bill scapegoats refugees and migrants for Canada's real problems while increasing racism and xenophobia. We note that no civil society groups were consulted or given the opportunity to provide input on these proposals – particularly those who work alongside refugees and migrants and with experience and expertise in refugee and immigration matters.

Canada's immigration and refugee system presents systemic barriers that make it difficult to gain refugee protection and legal resident status. A majority of those affected are both low-income and racialized (people of colour) and people without immigration status in Canada. We are especially concerned about the harmful consequences for survivors fleeing violence, women and girls, and 2SLGBTQIA+ people who already face a higher risk of physical and sexual assault, discrimination and little or no access to resources.

Canada has a well-established, proven, and respected independent refugee claims determination process. Bill C-2 proposes to prevent claims from even reaching the Immigration and Refugee Board, where they should be rightfully heard. While there are areas for

improvement in this system, this change means many refugee claimants will not even have access to a hearing and will be denied due process.

Some concerns:

Irregular arrival from the US

- Bill C-2 will make it even harder for people who enter Canada via the US to have their claim for refugee protection fairly assessed by Canada. At present, because of the Safe Third Country Agreement, people must cross irregularly and avoid detection for 14 days in order to not be sent back to the US and have their claim heard by Canada. Bill C-2 would prevent those people from having their claim heard by the Immigration and Refugee Board.
- It will essentially shut the door for all irregular arrivals from the US unless they meet the STCA exemption, which is a clear violation of our international obligations. The United Nations High Commissioner for Refugees (UNHCR) says, "Formal time limits for submitting an asylum application may result in refoulement and are therefore inconsistent with international refugee law."
- The US is not a safe country for refugee claimants, particularly those facing persecution because of gender or sexual orientation and survivors of intimate partner violence, and particularly now with the escalation of detention and deportation actions, including forced physical removal and detention in a third country.

One-year bar on refugee claims

- Bill C-2 will not permit a refugee claim for the rest of one's life if one year has passed since the person first arrived in Canada. It is retroactive and will apply to anyone who arrived in Canada after June 24, 2020. This measure appears to target international students as well as migrant workers.
- It appears to mirror the one-year bar in the US refugee determination system, but much worse, given the lifetime ban it will impose on making a refugee claim in Canada.
- It does not recognize that a person who did not face persecution when they arrived may face very different circumstances years later, as the situation in their home country or their personal circumstances may change. They can include situations such as the escalation of conflict and violence in certain countries, the targeting of specific ethnic and religious groups, the criminalization and persecution of 2SLGBTQIA+, and the criminalization and persecution of human rights activists, which could put the person at risk should they return to their home country.

PRRA is not adequate as a remedy

- The government suggests that a person prevented from making a refugee claim through measures such as the ones above may be offered a Pre-Removal Risk Assessment (PRRA)

- The Canadian Council for Refugees notes, “the PRRA is inadequate to protect the rights of refugees. It lacks the procedural protections of a hearing at the Immigration and Refugee Board. PRRA decision-makers (IRCC officials) do not have the independence nor the expert resources available at the IRB, a specialized quasi-judicial tribunal.”

Mass cancellation of immigration documents

- Bill C-2 gives the Immigration Minister new broad powers to pause, cap or cancel intake in any immigration stream if there is a high volume of applications. The government claims these powers are needed to prevent fraud.
- This will only create more uncertainty as groups such as economic-class and family-class applicants could face sudden suspensions. A previous Canadian government did exactly that in 2012 when it stopped the sponsorship of parents and grandparents, causing chaos, fear and tremendous hardship for Canadians. There is no appeal for these proposed measures.
- This power could potentially be used in the future to profile and target certain groups, as has happened in Canada’s immigration history.

International students are targeted

- Bill C-2 could deny post-graduate work permits to international students if they make a claim for refugee protection, and the multiple changes outlined can lead to their faster removal from Canada.
- International students who face new and elevated risks of persecution and a threat to life because of changed personal circumstances, or changed situations in their home countries, will be denied the possibility of seeking safety in Canada.

Privacy concerns

- Bill C-2 would expand the federal government’s powers to share personal information, including immigration status within IRCC and with federal, provincial and territorial partners. Information can be shared without consent.
- It is not clear what information would be shared and with whom. There is a high potential for unforeseen harmful consequences, particularly for people who are already vulnerable because of personal demographics (such as ethnicity, gender), immigration status and because of little or no access to resources.

There are several other concerns regarding immigration and refugee laws changes proposed in Bill C-2 that would put refugee claimants and migrants at risk by denying them due process and access to justice.

The previous Liberal government promised to introduce an immigration status regularization program for undocumented workers. This promise was not fulfilled. Instead, the government introduced small-scale, highly limited pilot programs, which had so many restrictions that only a

few applicants were successful. Many of those at risk of being targeted by the proposed Bill C-2 measures are those who have been waiting and advocating for an immigration status regularization program for years.

In the urgency to protect the safety and security of Canadians, we cannot afford to abandon our international human rights obligations and sacrifice the safety and well-being of refugee claimants and migrants.

We urge the government to withdraw Bill C-2 and withdraw from the Safe Third Country Agreement.

Signed by

AccessBC Campaign for free prescription contraception
Afghan Women's Organization Refugee and Immigrant Services
Ainembabazi Children's Project
Alex House
Artisan Church
Association of Neighbourhood Houses of BC
BC Poverty Reduction Coalition
Black Legal Action Centre (BLAC)
BRANCH (Building Relationships to Advance Newcomer and Community Health) Research Lab
Canada-US Border Rights Clinic
Canadian Centre for Policy Alternatives
Canadian Centre for Victims of Torture (CCVT)
Canadian Centre for Women Empowerment
Capital Rainbow Refuge
Centre communautaire des femmes sud-asiatiques/South Asian Women's Community Centre, Montreal
Chinese Canadian National Council – Social Justice (CCNC-SJ)
Chinese Canadian National Council Toronto Chapter
Chinese and Southeast Asian Legal Clinic (CSALC)
Chronically Queer
Colour of Poverty – Colour of Change (COP-COC)
COMPASS Refugee Centre
Community Legal Services of Ottawa/Services juridiques communautaires d'Ottawa
COSTI
Council of Agencies Serving South Asians (CASSA)
Covenant House Vancouver
DBNC - Dixie Bloor Neighbourhood Centre

Dignidad Migrante Society (La DIGNIDAD)
 Egale Canada
 Ethiopian Association in the GTA
 Excellence in Literacy Foundation
 Family Service Toronto
 FCJ Refugee Centre
 Fédération des femmes du Québec
 For Youth Initiative
 FrancoQueer
 Grandview Church
 Immigrant and Refugee Support Centre
 Immigrant Workers Centre - Centre des travailleurs et travailleuses immigrant-es
 Immigration and Refugee Legal Clinic
 John Humphrey Centre for Peace and Human Rights
 Journey Home Community Association
 Ligue des droits et libertés
 Live Educate Transform Society
 L'Observatoire pour la justice migrante
 Migrant Journeys Society of BC
 Migrant Workers Centre
 Miramichi Catholic Refugee Committee
 Multi-Agency Partnership of BC (MAP BC)
 New Brunswick Refugee Clinic - Clinique de Réfugiés du Nouveau-Brunswick
 New Hope Community Services Society
 OCASI – Ontario Council of Agencies Serving Immigrants
 Rainbow Railroad
 Rainbow Refugee
 Rainbow Refugee Association of Nova Scotia
 Righting Relations Canada
 Rural Refugee Rights Network
 Sanctuary Health
 SEP Immigration
 Settlement Assistance & Family Support Services (SAFSS)
 Social Enterprise for Canada
 South Asian Legal Clinic of Ontario (SALCO)
 South Asian Women and Immigrants' Services (SAWIS)
 Table de concertation des organismes au service des personnes réfugiées et immigrantes
 University Canada West
 Ventura Collective Ltd.
 Watari Counselling and Support Services
 Welcome Collective // Le Collectif Bienvenue
 Welland Heritage Council and Multicultural Centre

Women's Health in Women's Hands CHC
Women's Legal Education and Action Fund (LEAF)
Women's Shelters Canada
YWCA Ontario
YWCA Sudbury
YWCA Toronto