



Submission to the Standing Committee on Citizenship and Immigration

Study on the Recent Reforms to the International Student Program

Submitted by U15 Canada

December 6, 2024



About U15 Canada

U15 Canada is an association of fifteen leading research universities across Canada. U15 Canada works to optimize research and innovation policies and programs that advance knowledge, develop highly qualified leaders for all sectors, and mobilize knowledge for the benefit of all Canadians. In this way, U15 Canada seeks to help Canadian universities and partners make a prosperous, sustainable and just future for all.

Summary of Recommendations

U15 Canada makes the following recommendations to strengthen Canada's international student program:

1. **Rebuild Canada's Reputation and Reassure International Students**

Frequent and unpredictable policy changes are creating an environment of uncertainty that is undermining Canada's reputation as a welcoming destination for the world's top talent while introducing additional administrative complexity for applicants. This instability has already contributed to a notable decline in graduate student applications and therefore Canada's ability to attract the best and brightest. Canada must reaffirm its commitment to excellence and stabilize the international student system to ensure that talented individuals continue to choose Canada as a destination to contribute to our collective social and economic prosperity.

2. **Implement a Distinctions-Based Approach that Promotes Excellence**

As currently designed, the study permit caps introduced by the federal government fail to differentiate between institutions that uphold high standards in international recruitment, application processing and service provision and those the government is seeking to regulate. As such, U15 Canada recommends that the government deliver on its commitment to create a Recognized Institutions Framework that:

- Sets clear and measurable high standards for recruitment, admissions, and student support.
- Provides incentives for institutions to meet such standards and is leveraged to target policy interventions by the federal government.
- Uses IRCC-held data to ease administrative burdens for recognized institutions.

3. **Protect Canada's Talent Pipeline for Graduate Students**

The inclusion of graduate students in study permit caps restricts vital contributors to Canada's research and innovation ecosystem. U15 Canada urges the government to reconsider this policy, such as an exemption for doctoral students, who play a fundamental role in Canada's success in research and innovation. A cap on graduate students is a cap on Canada's innovative potential.



Introduction

U15 Canada is pleased to provide additional written feedback for the Standing Committee on Citizenship and Immigration's study on the recent reforms to the international student program.

Canada deserves a high-quality immigration system which attracts the best and brightest from around the world. Over many decades, the established consensus on the value of a managed and highly talented international student program provided many benefits to all Canadians. Firstly, it helped secure a pipeline of highly qualified talent, with the knowledge, language and education to succeed here in Canada. Secondly, it created strong international connections with future leaders in countries across the globe, positioning Canada for success in future academic, business or government partnerships. Thirdly, it leveraged Canada's soft power on the world stage, helping to access new trade partners and establishing a strong reputation for Canada as a leader in international education.

U15 universities were central to this success. Our universities have well-established international reputations that reflect global recognition for excellence in education, pioneering research, and impactful student experiences. Over many years, Canada's leading research universities helped build Canada's international reputation and the success of the international student program by responsibly growing study permit numbers, maintaining high standards for admission and providing extensive support for international students. This allowed our universities to grow enrolment at a modest rate and welcome more international students to Canada without impacting the quality of instruction for domestic Canadians.

In recent years, however, we have seen a rapid increase in the number of study permits being issued across the post-secondary system and concerns expressed with the integrity and rigour of the program due to the irresponsible actions of some institutions. While international students bring immense value to Canada, contributing \$37.3 billion to Canada's economy in 2022, it is always crucial to ensure that institutions have the resources in place to support students and fully realize their contributions on campus.¹

Canadians were rightly concerned about the pressures unrestricted growth of international students was having on their communities and essential services, as well as the damage to Canada's reputation from the quality of some students' experience while in Canada. This was largely due to a notable rise in admissions from certain institutions, often without the necessary supports in place to ensure student success.

In response, Immigration, Refugees and Citizenship Canada instituted several policy interventions in the last year. However, recent reforms have lacked nuance and failed to recognize responsible institutions like Canada's leading research universities, which have long maintained high standards and provided robust support systems for both domestic and international students. Moreover, the frequent and complex changes have significantly damaged Canada's reputation and acted as a deterrent to many prospective international students, especially the highest quality and most mobile, with potential competing offers from institutions elsewhere.

¹ Global Affairs Canada: <https://www.international.gc.ca/education/report-rapport/impact-2022/index.aspx?lang=eng>

The first step must be to end this ongoing uncertainty and rebuild Canada’s international reputation as a welcoming and supportive destination for international students. A more focused, distinctions-based approach to policy interventions would address the intended target of these measures while ensuring that Canada preserves the ability to attract top global talent. Our goal should be to ensure that Canada’s international student system upholds a commitment to excellence by focusing on attracting the best and brightest.

It is also vital to preserve Canada’s highly successful research ecosystem from the disruptions caused by implementing a cap on graduate study permits. International graduate students play a crucial role in labs and libraries across Canada, supporting researchers and pursuing new ideas that benefit all Canadians. The ongoing cap on graduate-level study permits should be reconsidered. In a highly competitive international marketplace for talent, Canada cannot afford to miss out on highly qualified talent who grow the economy and drive breakthroughs.

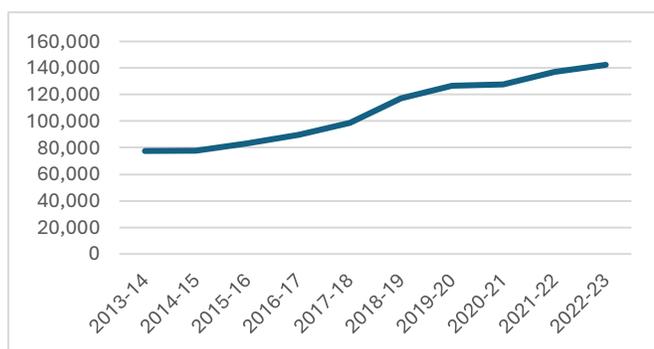
Overall, while recent changes have caused significant damage and created considerable uncertainty, U15 Canada shares the goal of returning to a managed international study program which upholds excellence and provides a high-quality talent pipeline for Canada. Leading research universities are a national asset towards achieving this goal, with the reputation, capacity and experience to welcome the best and brightest from around the world to Canada. We urge the federal government to recognize this and to build back Canada’s international student program with an emphasis on high standards and top talent.

Responsible Growth and Robust Support Mechanisms Across U15 Canada Institutions

International enrollment at U15 universities has grown by less than 7% on average between 2013/14 and 2022/23.² This measured and sustainable growth reflects U15 institutions’ commitment to providing students with the robust support mechanisms necessary for their academic and personal success while studying in Canada.

U15 institutions provide robust supports to ensure domestic and international student success and well-being, playing a leading role in delivering comprehensive Student Services. In 2021/2022, Canadian universities collectively spent over \$2.8 billion on these services, with U15 institutions accounting for 53%—or \$1.5 billion—of that total.³ These services include counselling, career guidance, athletics, health, accommodation, transportation, financial aid administration, bursaries, grants to student organizations,

Figure 1: International Enrollment at U15 Universities, 2013-2023



² U15 Canada, 2024.

³ CAUBO: <https://www.caubo.ca/knowledge-centre/dashboards/data-dashboards/fte-based-dashboards/>

cultural and social programs, and student daycare, reflecting our universities' commitment to fostering a supportive and enriching environment for students.

Dedicated international student offices across U15 institutions assist students in securing on-campus accommodations or connecting them with safe, reliable off-campus options. Many universities proactively address housing challenges by offering various forms of on- and off-campus housing services, providing international students with a stable foundation for their time in Canada while reflecting the differing housing needs of students at different periods of their academic journey.

Specific housing support ranges from:

- **On-Campus Housing:** Many U15 universities guarantee on-campus housing for first-year international students and provide specialized options for graduate students and families. For example, the University of Toronto provides a housing guarantee for all first-year undergraduate students, both domestic and international.⁴
- **Off-Campus Housing Assistance:** Institutions offer resources like verified landlord databases, rental listings, and workshops on tenant rights and responsibilities.
- **Emergency Housing Support:** Universities provide temporary housing solutions and funding for students facing unexpected housing challenges.
- **Pre-Arrival Housing Guidance:** Support includes consultations, pre-arrival housing resources, and virtual housing fairs to help students secure accommodations before arriving in Canada.
- **Community Partnerships:** Institutions collaborate with local housing providers and municipal authorities to increase student housing availability.
- **Cultural and Practical Support:** Services include help with lease agreements, utilities setup, and guidance on adapting to Canadian housing norms and transportation options.

At the same time, our universities have been working with partners, including municipal, provincial and federal governments, to deliver new units in on and off-campus housing stock in communities across the country. For example, the University of British Columbia announced a \$559.9 million partnership with the provincial government to build five new residences, providing over 1,500 student housing beds.⁵ Similarly, in Calgary, the University District partnered with private developers Parker and Gracorp to construct Aria, a mixed-use tower with 303 student-friendly apartments, integrated amenities, and retail spaces.⁶

⁴ University of Toronto: <https://www.utm.utoronto.ca/housing/applying/undergraduate/first-year-residence#:~:text=First%20Year%20Residence%20Guarantees&text=Residence%20is%20guaranteed%20for%20all,on%20StarRez%20by%20March%2031>

⁵ UBC: <https://news.ubc.ca/2024/08/government-funding-brings-more-affordable-ubc-campus-housing/>

⁶ Calgary Herald: <https://calgaryherald.com/business/local-business/parker-gracorp-building-new-student-housing-tower-university-district#:~:text=Aria%2C%20a%20mixed%2Duse%20tower,303%20attractive%20to%20students%20apartments.>

These measures not only help alleviate the pressure on local housing markets but also ensure that international students can focus on their academic and research pursuits with access to a full spectrum of housing options.

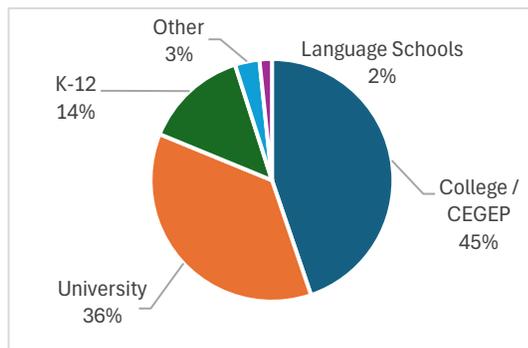
In addition to housing supports, U15 institutions provide a range of services tailored to the unique needs of international students, including pre-arrival guidance, cultural integration programs, financial literacy workshops, and access to mental and physical health resources. By prioritizing the well-being and success of their students, U15 universities exemplify best practices in international student support, reinforcing Canada’s reputation as a world-class destination for higher education. Canada’s international education framework should exemplify these high standards, reinforcing the country’s reputation as a world-class destination for higher education.

The Context of Reforms

The number of international students holding active study permits in Canada reached 1,040,985 in 2023—a 29% increase from 2022 and effectively tripled since 2015. The rapid pace of growth in recent years has raised concerns about the sustainability of Canada’s international education system and led to the changes that are the subject of this study.⁷ However, it is important to note that much of this growth was driven by a relatively small number of institutions growing exponentially and did not reflect the actions of the entire post-secondary system. During this period, Canada’s leading research universities experienced only modest growth in international student numbers in comparison to others in the sector. Increased study permit numbers were driven, in large part, by institutions that prioritized rapid expansion without the necessary capacity to support international students in their community.

For instance, international enrollment in college programs, particularly in Ontario, was a major driver of the overall growth in study permit holders in Canada. In 2021, Ontario accounted for 49% of the country’s total international students, increasing to 52% by 2023. That same year, colleges and CEGEPs surpassed universities as the primary level of study for international students in Canada,

Figure 2: Study Permit Holders on December 31st, 2023, by Level of Study



representing 45%—or 466,109—of the 1,040,985 study permit holders.⁸

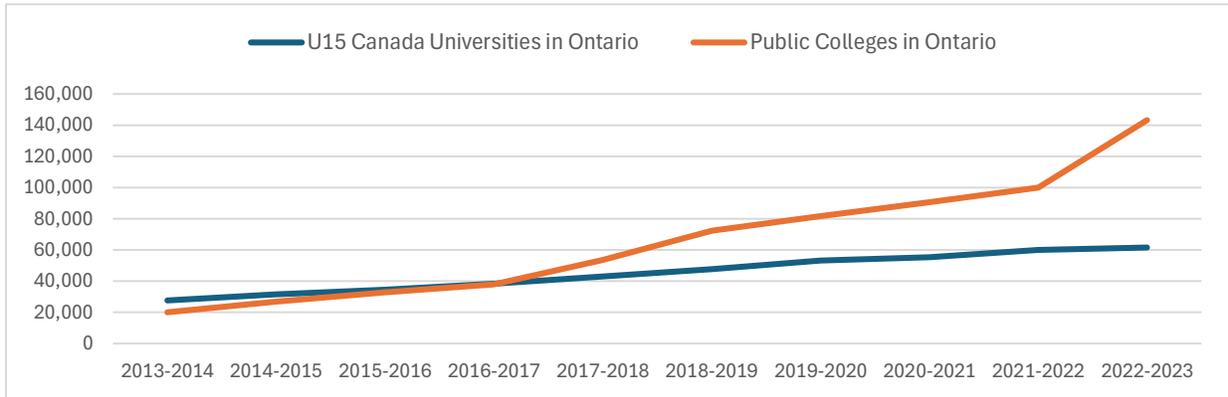
This shift reflects a decade-long trend: the number of full-time international students at Ontario’s public colleges grew by 615% in just ten years, climbing from 20,043 in 2013/14 to 143,241 in 2022/23.⁹ By comparison, international enrollments across Ontario’s six U15 Canada universities increased at only 122% over the same period, a fifth of the growth rate.

⁷ IRCC 2024: <https://www.canada.ca/en/immigration-refugees-citizenship/corporate/transparency/committees/cimm-feb-28-2024/international-student-program-at-a-glance.html>

⁸ Ibid.

⁹ Ministry of Colleges and Universities Ontario: <https://data.ontario.ca/dataset/college-enrolment>

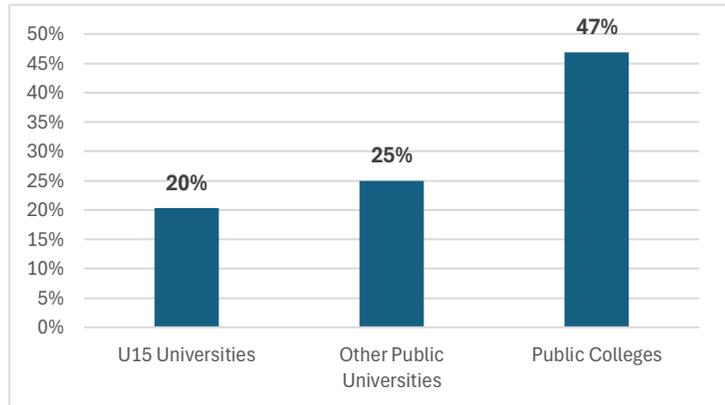
Figure 3: International Students at U15 Universities and Public Colleges in Ontario



In Ontario colleges, the rapid rate of this growth has drastically outpaced domestic enrollments, meaning that international students now comprise an average of 47% of full-time students in the province’s public colleges, according to the latest enrollment data from the Ministry of Colleges and Universities. This rapid growth compares to an average of just 20% across U15 Canada’s six Ontario institutions and 25% across the province’s 18 other public universities.

This growth has far outpaced the ability of many institutions to scale essential wraparound supports, such as housing, counselling, and integration services, leaving many international students vulnerable to significant academic and personal challenges. As a result, the surge in international student enrollment in many colleges and a few small universities has coincided with troubling trends, including reports of students living in overcrowded conditions due to

Figure 4: Average International Student Share of Fulltime Student Body in Ontario (2022/2023)



inadequate housing, a sharp rise in asylum claims, and reports of unethical recruitment practices. For example, asylum claims filed by international students in Canada rose dramatically from 1,810 in 2018 to 11,975 in 2023—a 650% increase. So far, in 2024, there have been nearly 14,000 such asylum claims.¹⁰

Analysis of IRCC data by *Policy Options* reveals that at 37 Canadian Designated Learning Institutes (DLIs), 10% or more of their international students applied for asylum between 2018 and 2024, with 11 institutions exceeding 30%.¹¹ Notably, none of the identified institutions are a part of U15 Canada.

¹⁰ Globe and Mail: <https://www.theglobeandmail.com/canada/article-international-students-asylum-claims-canada/>

¹¹ Policy Options: <https://policyoptions.irpp.org/magazines/november-2024/institutions-students-asylum/>

In January 2024, responding to these concerning trends, the federal government introduced a temporary two-year cap on the issuance of study permits, setting the annual limit at 364,000—a 35% reduction from the 579,075 permits issued in 2023. This cap was established on a province-by-province basis with the aim of curbing unsustainable growth, particularly with an eye to the strain on housing, healthcare, and public services. Further reductions were announced in September 2024, lowering the study permit cap to 437,000 for 2025 and 2026—a 10% decrease from 2024 levels.¹² For the first time, master’s and doctoral programs have been included under the study permit cap, ending their previous exemption.

These sweeping changes failed to distinguish between institutions that have grown rapidly and those that have responsibly managed international enrollment, despite the government’s stated goal being to protect students from “bad actors” and support sustainable growth.¹³ As a result, the reforms have also penalized high-performing institutions that have invested in world-class wraparound supports to ensure international students succeed both academically and personally. This one-size-fits-all approach has undermined the efforts of institutions that uphold Canada’s reputation for educational excellence and have promoted a talent pipeline vital to Canada’s future prosperity.

Recommendations:

1. Implement a Distinctions Based Approach through the Recognized Institutions

Framework. To better distinguish responsible actors, U15 Canada recommends that Immigration, Refugees and Citizenship Canada deliver the previously announced Recognized Institutions Framework. Such an approach should set high standards for recruitment, admissions, and student support, focus policy interventions on institutions with poor practices, and ease administrative burdens for institutions that meet or exceed these standards. Such a distinctions-based approach would protect students, promote excellence, and ensure the sustainability of Canada’s international education system. Additionally, this would provide policymakers with the tools necessary to institute targeted reforms or policy interventions that do not undermine Canada’s international education and research and innovation ecosystem.

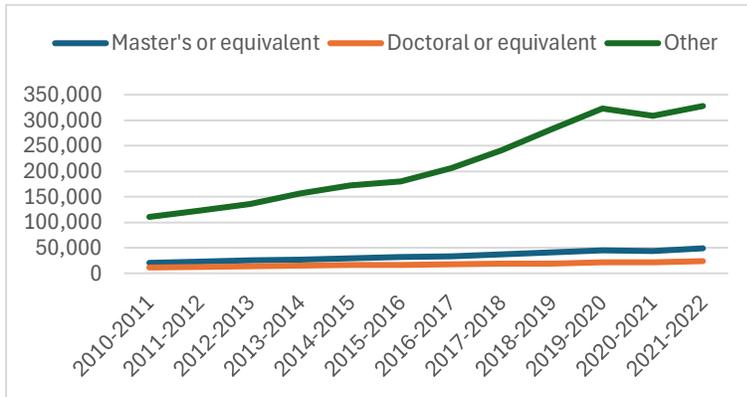
Consequences for Canada’s Research and Innovation Ecosystem

Recent changes, particularly the inclusion of master’s and doctoral programs under the study permit cap, threaten Canada’s research and innovation ecosystem. Compared to other qualification levels, international graduate enrollment has grown sustainably over the past decade, with master’s programs increasing by 140% and doctoral programs by 110%. In an increasingly competitive landscape for highly qualified talent, the next generation of researchers and innovators

¹² IRCC: <https://www.canada.ca/en/immigration-refugees-citizenship/news/2024/09/minister-miller-and-minister-boissonnault-to-announce-additional-actions-to-protect-our-immigration-system.html>

¹³ IRCC: <https://www.canada.ca/en/immigration-refugees-citizenship/news/2024/01/canada-to-stabilize-growth-and-decrease-number-of-new-international-student-permits-issued-to-approximately-360000-for-2024.html>

Figure 5: International Enrollments at Public Postsecondary Institutions in Canada



are critical to Canada’s long-term success. They represent the talent Canada should seek to attract and retain, with over 50% of international graduate students becoming permanent residents within a decade.¹⁴

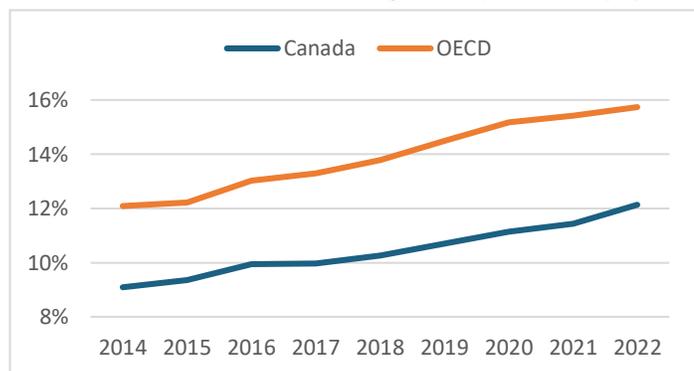
Moreover, unlike undergraduate programs, graduate studies are concentrated at research-intensive universities where the majority of research takes place, reflecting decades of targeted investments in

world-class research centres with the infrastructure and expertise to attract highly qualified talent. U15 universities, for instance, educate 60% of Canada’s graduate students, including 70% of international doctoral students, who are critical to driving research. Although 12% of the national cap has been allocated specifically for graduate students, additional application requirements risk being perceived as barriers by this highly mobile and sought-after population. Furthermore, the lack of clarity regarding the distribution of the graduate carve-out among provinces raises concerns about the potential impact on research and innovation in Canada.

Canada already lags in advanced degree attainment, ranking 27th among OECD countries. To meet the OECD average, Canada would require an additional 681,000 advanced degree holders—a 41% increase.¹⁵ Losing out on international graduate students, who play a critical role in filling this gap, would be detrimental to Canada’s efforts to bolster its research and innovation ecosystem and achieve global competitiveness.

Study permit processing delays and policy uncertainty have already hindered Canada’s ability to attract highly qualified talent, with IRCC processing for cap-exempt graduate program applications declining by 29% in Q1 2024 and 24% in Q2 – even before they were incorporated into the cap and PAL system.¹⁶ These ongoing disruptions threaten to weaken Canada’s global competitiveness and innovation capacity.

Figure 6: Share of Population, 25-64, with a Master’s or Doctoral Degree/Equivalent (%)



¹⁴ Statistics Canada: <https://www150.statcan.gc.ca/t1/tbl1/en/cv.action?pid=3710016301>

¹⁵ OECD: <https://data-explorer.oecd.org/>

¹⁶ ApplyBoard: <https://www.applyboard.com/applyinsights-article/looking-ahead-to-2025-predictions-for-canadas-international-student-program>

Recommendations:

- 2. Reassure International Students Through Stable and Predictable Policy Frameworks.** To restore Canada's reputation as a destination for top talent, it is critical to create a stable and predictable policy environment for international students. Ad hoc and ever-evolving changes create uncertainty that undermines Canada's attractiveness and trustworthiness as a study destination. A clear, consistent, and well-communicated policy structure would reassure prospective students that Canada remains a reliable and supportive place to pursue their academic and professional ambitions.
- 3. Exempt Graduate Students from Study Permit Caps.** Graduate students are vital to Canada's research and innovation ecosystem, driving breakthroughs and contributing to long-term economic prosperity. Exempting master's and doctoral programs from study permit caps would facilitate the recruitment of the world's best and brightest talent. By easing barriers for these highly qualified individuals, Canada can strengthen its global competitiveness and innovation capacity while supporting the continued development of research-intensive institutions.

Conclusion

Canada's economic and social prosperity relies on its ability to attract and retain top global talent. U15 universities are dedicated to upholding high standards and supporting international students who bring immense value to Canada. By implementing targeted reforms and fostering responsible growth, Canada can ensure a sustainable international education system that addresses legitimate concerns while continuing to thrive. Canada must return to promoting excellence in international education, ensuring institutions uphold the highest standards in recruitment, admissions, and support services.

In a rapidly evolving global landscape, we must embrace our role as a leader in education and research, signalling to the world's best and brightest that they have a place here to grow and innovate.