



Commission de l'assurance-emploi du Canada
Commissaire (employeurs)

Canada Employment Insurance Commission
Commissioner (Employers)

October 20, 2026

The Honourable Lena Diab
Minister of Citizenship and Immigration
House of Commons
Ottawa, Ontario
K1A 0A6

Dear Minister Diab,

As you finalize the immigration levels plan, I wish to reiterate the key messages of Reimagining Immigration, (attached) a controlled pathway for lower skilled immigration to this country.

Canada's demographics limit the domestic labour supply. Canada's aging population means more workers are retiring than entering the labour market. Fewer young Canadians are available—or willing—to take on physically demanding, seasonal, shift based, or lower wage jobs. Even with higher participation rates, the domestic workforce cannot fully replace retiring workers in many of these occupations. Canada's only labour force growth has come from immigration this includes low skilled.

Youth employment issues are real—but blaming lower skilled immigrants oversimplifies the problem. A healthy labour market makes room for young workers and fills essential jobs that would otherwise go vacant. The evidence does not show that lower skilled immigrants are displacing Canadian youth. Youth unemployment is driven mainly by school to work transitions, job preferences, scheduling constraints, and geography—not immigration. We also need to consider the unique challenges of rural Canada. According to Statistics Canada, the unemployment rate for 15–24-year-olds in rural Canada fell to 7.4% in rural and small-town Canada in August 2026.





A recent study by Hou, Koumaglo, and Zhang (2025) commissioned for IRCC reveals a limited impact on housing costs from immigration. In fact, low skilled immigration can contribute to increasing the supply of construction workers and related trade workers to alleviate labour and skill shortages that restrict housing supply.

Canada needs workers at all skill levels to keep the economy functioning. Canada's competitiveness and economic growth envisioned in Building Canada Strong depends on skills at all levels, not just top tier. A high skilled economy still relies on a full occupational ladder. An immigration system focused only on top end skills ignores how real economies work.

One third of all jobs in our economy are low-skilled and labourer. They are the backbone of many operations from nursing homes to hospitals to the service sector. Lower skilled immigrants complement the Canadian workforce by filling persistent gaps in essential jobs that Canadians alone cannot currently meet.

Employers have turned to the Temporary Foreign worker program to help them get the human resources they need to maintain their operations and grow. This program is not ideal, as the jobs the employers have on offer are often permanent. Thus, they constantly scramble as work permits expire to find ways to extend the tenure of the foreign worker they have recruited and trained. This creates uncertainty for business, workers and discourages investment. The irregular pathway via TFW program is insufficient and does not provide confidence or certainty for all involved – the worker, the employer and Canadians. The TFW program, which is not fit for purpose fosters low retention rates which further erodes confidence. According to research in the UK to reduce labour turnover, a migration system must allow workers to stay and thrive in their jobs, bring their dependants and build stable lives.

As you set the levels for the next 3 years, I recommend that you include pathways for low skilled and labourer that is controlled, complements Canadian workers, provides certainty and confidence in our immigration system. The Canadian International Workforce Program (CIWP) stream outlined in the Reimagining Immigration policy paper proposes the establishment of a permanent solution that builds on the best practices of many Canadian pilot projects, as well as from other jurisdictions like the United Kingdom and Australia.



Reimagining Immigration, reviewed by the International Organization for Migration and endorsed by over 80 associations recommends that we encourage newcomer settlement success by tying immigration to a job offer, promoting immigration to rural and remote areas and recognizing immigrants who are willing to take jobs that Canadians don't want due to geographic location or job type.

A balanced immigration system that addresses labour needs with sufficient lower skilled workers can enhance productivity, encourage investment, reduce pressure on supply chains and keep consumer prices in check.

Most Canadians are not anti-immigration but are concerned about how immigration is managed. I encourage you to consider the recommendations in Reimagining Immigration as you finalize the levels plan. A resilient labour market is not built by choosing between skilled and lower skilled workers – it is built by ensuring every essential role is filled in a way that supports growth, fairness and sustainability. In addition, it will help secure public confidence.

I am happy to meet with you to elaborate on the paper.

Sincerely,



Nancy Healey

Commissioner for Employers

cc The Honourable Patti Hajdu, Minister of Jobs and Families

The Honourable Buckley Belanger, Secretary of State for Rural Development

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