

August 24, 2022

**Yasir Naqvi, M.P.
House of Commons,
Ottawa, Ontario
Canada K1A 0A6**

Re: Afghan and General Refugee Processing Delays and Suggestions

Dear Yasir,

This letter follows up from our meeting on August 10, 2022 regarding ways to meet the government's Afghan refugee commitment of 40,000. Here are some suggestions for increasing the intake and processing of Afghan refugees to meet this target. These suggestions are not tied to the existing target of 40,000, which is somewhat of an arbitrary number by nature. Also included are suggestions about refugee processing generally, and how the backlogs in refugee processing could be streamlined.

Ottawa Centre Refugee Action

[Ottawa Centre Refugee Action](#) (OCRA) is a grassroots community refugee sponsorship organization. You can read about [our efforts to sponsor Afghan refugees](#) on our website. OCRA was established in 2015 in the context of the Syrian refugee crisis and at that time you (then our MPP) supported our community outreach by speaking at several community events we organized. OCRA's community settlement and integration work has benefitted from the work and contributions of well over 500 volunteers and donors, largely based in Ottawa Centre.

Since 2015, OCRA has sponsored 22 families (68 people) who have arrived in Canada. There are currently 11 OCRA sponsorship applications in the refugee sponsorship process, either at IRCC visa offices (4) or awaiting space allocations with Sponsorship Agreement Holders (7).

We currently have 3 group/ individual applications for Afghan refugees in process. 1 application was submitted to IRCC earlier in August under IRCC's Operation Afghan Safety stream. We are raising money for a family of 5 so their application can be submitted to IRCC, also under the Operation Afghan Safety stream, and 1 for a young university student currently in Iran who we are trying to qualify for expedited treatment.

Here is OCRA's article on [the issues with processing Afghan refugee sponsorships](#).

Afghan Refugee Processing

As of August 18, 2022, a year after the Taliban takeover of Afghanistan, 17,590 Afghan refugees have arrived in Canada. This is less than half the number promised by the government. Difficulties in processing have resulted in the government extending the timeline for Afghan refugees to come to Canada from 1 year to an open ended commitment currently, and for the government to stop referring to the 40,000 target in its announcements and answers to questions from Parliamentarians and the press unless pressed. Here are suggestions for increasing the flow of Afghan refugees to Canada in order to meet this important commitment.

1. Remove space caps on the Operation Afghan Safety Program. Sponsorship Agreement Holders are currently capped at 50 spaces.
2. Expand general space allocations to SAHs to accommodate the 40K commitment by creating a special allocation of up to 10,000 spaces for Afghan refugees. Currently Afghan sponsorships for refugees not meeting the OAS criteria are in the general allocation queues maintained by Sponsorship Agreement Holders, all of whom refer sponsorship applications to the government chronologically, and all of whom are backlogged because IRCC did not issue the annual space allocations to these organizations until July this year, instead of in early February, and because IRCC suspended processing of all applications for a number of months this year. Creating a special allocation / stream for Afghan refugees would allow Afghan sponsorships to move forward without interfering with the sponsorships for refugees in other countries that now dominate the general SAH queues. There is a great deal of public support for Afghan refugee sponsorship as evidenced by our fundraising efforts, and the availability of spaces for Afghan refugees generally would be taken up quickly.
3. Expand OAS to include young women (under age 30?) precluded from pursuing higher education. Women are recognized by IRCC as vulnerable generally but there is no category for them in OAS unless they are leaders (i.e. judges, professors, political or NGO leaders). Allow their families to accompany them.
4. Enhance visa office capacity in Islamabad, Istanbul, Kazakhstan and Brazil to process the refugee applications in locations where Afghans have fled. Increased visa office capacity will speed up the processing of applications. Work with UNHCR to request referrals of Afghans who are in these countries. We receive emails every day from Afghan refugees pleading for help who say that UNHCR in the country they have landed have not been asked to make referrals to Canada for many years. UNHCR or other trusted partner referrals can be used to populate the BVOR lists, which are

hugely attractive to refugee sponsors, with Afghan families, and the Afghan GAR arrivals. This strategy worked well during the Syrian refugee crisis and could work for Afghan refugees too.

5. Address the situation of the many (thousands) Afghans in Iran where there is no visa office. The latter are under a huge threat of deportation to Afghanistan, which has started to occur already. Afghan refugees in Iran should not be required to travel for interviews, or the government should fund that travel. Refugees without passports to leave Iran should be interviewed virtually. Ask a trusted partner like UNHCR or others to work with Iran to release / grant exit visas to refugees being taken by Canada, so that Single Journey Visas issued by Canada will be recognized and honoured.

6. Make efforts for diplomatic assurance to countries now requiring passports or entrance permits like Pakistan, India, Iraq, Iran, Turkey that Afghan refugees up to a stated number reflecting the 40K commitment will be processed for referrals to Canada or under private sponsorships for eligibility, security etc within stated timeframes, and given single journey documents for Canada (this was done for Syrian refugees and speeded up acceptance of refugee inflow to Jordan, Lebanon and Turkey. Require lifting of passport and immigration permits, and the granting of exit permits, if this is done.

These suggestions might be easier said than done, but they can be done with a concerted effort and if the resources, leadership and skill needed to accomplish this, are deployed.

Suggestions About Refugee Processing

Here are some suggestions regarding refugee sponsorship processing generally:

1. Make IRCC more transparent to sponsors and individual applicants. The lack of transparency is the single most difficult frustration for applicants and sponsors. The only way for sponsors to get information currently is through our MP's offices. More communication of the anticipated wait time for sponsors to be approved by IRCC in Ottawa, communication of the anticipated wait time for interviews of the refugee applicants to take place, communication of how long the wait time will be for medical tests, and the normal wait times for security processing would be extremely helpful in managing the expectations of the settlement support groups and the refugees themselves.

2. To back this up, implement service / processing time standards for IRCC in Ottawa and the visa offices. Currently there is only a reporting of experienced processing times, and no service standards. The latter would promote efficiencies and likely, the speeding up of application processing. Currently the Canadian visa offices appear to have no real supervision of their processing results. It is in the visa offices that refugee applications can languish for years, and supervision of the performance of these offices would help to reduce the delays experienced around the world.

3. Consider standardizing the forms the visa offices use. In our experience, visa offices are permitted to ask for additional forms for military history and for social media use. Moreover, each visa office appears to use different forms for these purposes. The Detailed Military History forms used by many visa offices, for example, are repetitive of the same information given in the Schedule A Background Declaration that is part of the refugee application and which the visa offices already have. This additional form is relative and not needed. It is also suggested to ask for the social media information with the refugee application, and then ask for an update when refugees are interviewed. It would save three weeks, likely more, of processing delays to drop this practice of requiring additional forms at the discretion of each visa office.

4. Ensure CSIS has the capacity to process security assessments/ validations. The security reviews are where post - interview delays are particularly acute. Ensure the CSIS reviews reflect the realities a refugee faces. Many do not have identification and records available from the governments/ countries they fled. Ask CSIS to be more transparent about information they typically need to see, so that this can be provided in advance. Ensure CSIS is adequately staffed for this work so that the security reviews are not the cause of inordinate delay they way they are now.

5. The application forms are crazily inefficient, complicated and reflect badly on the government. There was very bad press about Canada's application forms at the beginning of the Afghan crisis, but also when the Ukrainians tried to apply through the immigration streams. I can think of at least 5 ways to streamline these forms. The refugee application forms reflect a silo approach within IRCC to the processing because much of the same information is requested on each of the three documents comprising the application. This silo approach likely causes delays. Here are point form suggestions:

- Use the Identification and birth date information in the IMM0008 Generic Application to populate the Schedule A Background Declaration and Schedule 2 Refugees Outside Canada forms. Do this by making the refugee application documents into a group or suite where they interact. Similarly, information about education is required in both the IMM0008 Generic Application and the Schedule A Background Declaration. It is not necessary to require this information twice.
- Combine the Schedule A Background Declaration with the Schedule 2 Refugees Outside Canada. Currently information about registration with UNHCR is requested on both the Background Declaration and the Schedule 2 Refugees Outside Canada. Request it once in a combined form. Currently the Schedule 2 requires naming of all relatives, dead or alive, with script from the country of origin, by each person in a family over 18 years of age. The Background Declaration also requires the naming of the father and mother of each person over 18 filling out the form, with script from the country of origin. A review of the need for all this information would be merited. Clearly this could be combined in one form.

- There is really no need for children over 18 to repeat much of this information about relatives, and to repeat the names of their parents, birthdates etc. on their Background Declarations and Schedule 2 documents. In addition the narratives in Schedule 2 about reasons for fleeing the country of origin and the route taken to get to the country of refuge will often be the same. Consider asking children over 18 to only add information about their own experiences in fleeing their country, or if they took a different route. Similarly information about addresses and activities in the Background Declaration will be the same as their parents.
- Reconsider the necessity of naming relatives in Canada on the Schedule 2 form. This might have been added to assist with the placement of BVOR refugees, but it should be limited to 2-3 names/ locations. It is often onerous to fill out the information for all relatives.
- Currently information about registration with UNHCR is requested on both the Background Declaration and the Schedule 2 Refugees Outside Canada. Combine these forms and request it once, or eliminate it from Schedule 2.

There are other areas where the process could be made easier for both immigrants and refugees. This is an area that deserves real attention if Canada wants to attract immigrants and retain its reputation as a leader in processing and accepting refugees.

I hope that you find these suggestions helpful. Please feel free to circulate them as you like. I would be happy to answer any questions that you have. Thank you for reading, your attention to these issues is really appreciated!

Best regards,



Patricia Wilson
Family Reunification Co-ordinator /Volunteer
Ocra613@gmail.com
(613) 863-7179