



February 21, 2024

Re: Immigration measures in response to the conflict in Sudan

The Honourable Marc Miller, P.C., M.P.
Minister of Immigration, Refugees and Citizenship
365 Laurier Avenue West
Ottawa ON K1A 0C8

Dear Minister,

The Canadian Council for Refugees (CCR) welcomes the federal government's actions to support a peaceful resolution of the conflict in Sudan and to provide humanitarian assistance to the millions of people displaced and otherwise affected by violence and insecurity, as a result of the continuing conflict.

CCR also welcomes the [immigration measures](#) announced by the government, including to facilitate family members entering or remaining in Canada on temporary visas, and the family-based humanitarian pathway to permanent residence, to be opened on February 27, 2024.

We write, however, because the situation in Sudan warrants more significant Canadian action that reflects a more equitable response commensurate with the scale of the humanitarian crisis unfolding on the ground. Approximately [10.7 million people have been displaced](#) in the conflict, including [1.6 million](#) outside the country. More [children are displaced](#) in Sudan than in any other crisis in the world. As the people of Sudan face the [world's worst hunger crisis](#) in decades, the UN and its partners are [appealing to the international community](#) for a greater refugee and humanitarian response.

Need for equitable responses to humanitarian crises

Canadians expect the government to show leadership in providing immigration pathways to people affected by major catastrophes. Canada has demonstrated it has the capacity, through the measures adopted in response to the situations in Ukraine and Afghanistan. However, there has been a longstanding neglect of the African continent, and crises such as the one unfolding in Ethiopia's Tigray region in recent years, for example, have not been met with any special measures. We note that despite the scale of the crisis in Sudan, media and political attention has been limited.



As UN Emergency Relief Coordinator Martin Griffiths [recently said](#), “Sudan keeps getting forgotten by the international community.” In this context, we welcome the recent initiatives for Sudan, as well as those for [Palestine](#). However, the specific measures offered show continued inequities, which underlines the need for a policy framework for immigration responses to crises around the world, to ensure effective and equitable measures. Further below we detail some of our core recommendations for this framework.

Sudan special immigration measures: Key concerns and recommendations

The measures announced by the government represent a positive response to the crisis. Nevertheless, a number of significant concerns have emerged for us, drawing on the input of our members and through discussions with members of the Sudanese community in Canada.

We note also that the details of the operationalization of the [family-based humanitarian pathway](#) are not yet known, since it will only take effect on February 27. This means that we cannot fully comment on how accessible it will be. We hope that there is an opportunity to influence the processes for the pathway.

a) Include a government resettlement response

While we welcome the government’s decision to provide avenues by which Canadians can respond to family members, we regret that the humanitarian pathway is exclusively for people with family links to Canada, and that the responsibility for supporting Sudanese admitted through the pathway is laid entirely on the shoulders of those Canadians with affected family members.

CCR advocates that, in the context of emergency response, resettlement be primarily through the Government Assisted Refugee Program. It is unfair to ask private citizens, whether it be those who have family ties to the region or private sponsors, to take the lead in supporting Canada’s response. The Canadian government needs to step up, in the name of all Canadians, in providing resources so that people affected by the crisis can start a new life in Canada.

We are also concerned that limiting the response to a family-based pathway excludes people who do not have family links to Canada, a situation exacerbated by Canada’s narrow definition of ‘family’.



As we saw with the responses to Afghanistan and Ukraine, it is important to offer avenues to people who do not have family links here or who have family in Canada who do not meet the criteria. This includes human rights defenders, people who are particularly vulnerable because of disability, sexual orientation or gender identity, and people who have significant connections to Canada other than family connections.

b) Eliminate the tight restrictions on numbers for humanitarian pathway

The crisis in Sudan, as noted above, is of catastrophic proportions. [People in Sudan](#) lack food, clean water, health care and safety. Over one and a half million are displaced outside the country. Given the scale of the crisis, the limit of 3,250 applications in the [family-based humanitarian pathway](#) is inadequate to the need. In contrast, Canada admitted an unlimited number of Ukrainians on temporary visas, and the [pathway to permanent residence for Ukrainians](#) is similarly without a cap. The neglect of Sudan in the media should not affect the level of Canada's response.

c) Ensure greater support to families

The family-linked humanitarian pathway offers a welcome avenue for Canadians seeking to assist family members affected by the conflict in Sudan. However, the financial demands placed on the anchor family members in Canada are heavy. They must be able to pay for the basic needs of their family members for one year after they become permanent residents. In many cases, this is beyond their capacity, especially if they have many family members who need a safe place to go, and if the anchor family members themselves have only recently arrived in Canada. It is important to bear in mind that many Canadians of Sudanese origin have been supporting their families financially since the outbreak of the conflict.

As we noted above, CCR advocates that family and private sponsors should not bear the primary responsibility for emergency responses to global crises. The government needs to play its part.

The inequity is stark for all observers, not least for the Sudanese Canadian community, and bears repeating. Those fleeing war in Ukraine were not required to show that they had the financial support of family members, either for the temporary visa to enter Canada, or for the [family-linked pathway to permanent residence](#).



In addition, the government of Canada showed leadership in providing a one-time non-taxable financial payment for Ukrainians arriving under CUAET, and in developing an infrastructure with other levels of government and community partners to provide settlement supports, including access to services, housing, education and employment. The same level of generosity should be extended to those arriving in Canada fleeing the conflict in Sudan.

d) Remove processing fees and hurdles

We are conscious of the need for flexibility in processing, taking into account the challenges faced by people displaced by conflict. We have already written to you about barriers for Palestinians in Gaza applying through Canada's recently opened pathway.

Since the Sudanese pathway is not yet open, we urge you to consult with the refugee settlement sector and the Sudanese diaspora to ensure that there is flexibility built into the process. For example, where individuals cannot readily complete biometrics, there should be openness to completing it on arrival in Canada.

Processing fees for visas and biometrics should be waived. The Canadian government rightly recognized the need for fee waivers for those fleeing Sudan in a [public policy adopted in April 2023](#). While possibly a few applicants for the new family-linked pathway may benefit from that policy, the vast majority will not. The financial needs can only have gotten worse as the crisis continues, making it inconsistent as well as inhumane not to provide a fee exemption as part of the new pathway.

e) Expedite permanent residence for accepted refugees

Several hundred Sudanese accepted as refugees in the past couple of years are unable to serve as anchor relatives for their family, since the policy requires anchor relatives to be citizens or permanent residents.

Given that the current processing time for accepted refugees to become permanent residents is [28 months](#), we request that applications from Sudanese Protected Persons be expedited, in order to give them the opportunity to respond to their families in need.



f) Include refugees from other countries who are displaced again

At the time of the outbreak of the current conflict in April 2023, Sudan was hosting [over a million refugees](#), mainly from South Sudan, Eritrea, Syria, and Ethiopia. Some were being sponsored by Canadian groups.

The conflict has displaced many refugees again, either within Sudan or across the border. Those still in Sudan suffer from the humanitarian crisis as do Sudanese. The UNHCR's capacity to protect and support refugees is [severely limited due to the security situation](#). Those who have fled across borders also face insecurity and hardship.

Canada's immigration measures are focused on Sudanese nationals, neglecting the non-Sudanese who are also affected by the crisis.

We urge that, at a minimum, processing be expedited and flexibility shown for refugees in the process of resettlement to Canada who have been affected by the crisis in Sudan. This would build on previous actions by your government, including the work with UNHCR and the International Organization for Migration in Ethiopia to charter a flight that brought over 300 Eritrean refugees who had been further displaced by the war in Sudan, to safety in Calgary in December last year.

g) Consult on and develop an effective and anti-racist policy framework for immigration responses to crises

CCR continues to urge that Canada adopt a rapid response framework to respond to humanitarian crises that is transparent and equitable regardless of race, nationality and ethnicity and that respects the principle of additionality.

The framework should be triggered by objective criteria focused on the need for the protection of displaced peoples, rather than the level of media coverage or organized political pressure. These criteria must:

- Be transparent.
- Respect equity in responses.
- Avoid negative impacts on other refugees (by respecting the principle of additionality – both of numbers and of resources).
- Provide resettlement primarily through the Government Assisted Refugee Program (because private sponsors should not bear the main responsibility for emergency responses, and it is important to avoid an impact on other privately sponsored refugees).



- Develop equal opportunities for nationals, refugees and others needing humanitarian protection to access temporary and permanent pathways to protection in Canada.

We would welcome an opportunity to meet to discuss these issues.

Sincerely,

Diana Gallego
President

Cc. Dr. Harpreet S. Kochhar, Deputy Minister of Immigration, Refugees and Citizenship