



## Comments on proposed changes to the transportation loan

Representations concerning the proposed changes to the *Immigration and Refugee Protection Regulations* pre-published in the Canada Gazette, Part I, Vol. 151, No. 39, on 30 September 2017

### 1. The government should absorb the costs of transportation and eliminate the loan for refugees

The Canadian Council for Refugees (CCR) urges the government to abolish the immigration loans for refugees altogether. The loan is a significant obstacle to the settlement and integration of resettled refugees: in order to improve those outcomes (which is a government goal), the loan must be eliminated.

As noted in the Canada Gazette, the CCR's position on the loans is longstanding.<sup>1</sup> It was articulated in 2008 in a resolution adopted by the CCR members:

#### **Immigration Loans Program**

Res.: 5, May 2008

Whereas:

1. Resettled refugees and dependants abroad of protected persons are required to repay the costs of overseas medical exams, IOM processing charges, and travel costs;
2. Under IRPA, Canada has made a commitment to resettle refugees who are most in need of protection, many of whom have multiple barriers to their integration;
3. Repayment of these loans by single mothers, youth, and families further marginalizes and impoverishes these groups, diminishing their capacity to integrate;

Therefore be it resolved that the CCR call upon the Governments of Canada and Quebec to absorb the costs of the transportation and overseas medical expenses for resettled refugees and dependants abroad of protected persons, without reducing the total number of resettled refugees.

The CCR's members continue to raise grave concerns about how the loans undermine refugees' ability to integrate and to contribute to their full potential in their new home. This applies both to Privately Sponsored and Government Assisted Refugees.

The government's own evaluation report found that the burden of the loan was compromising some refugees' settlement.<sup>2</sup> Similarly, in its December 2016 report, "Finding Refuge in Canada: A Syrian Resettlement Story", the Senate's Human Rights Committee highlighted the economic burden of

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<sup>1</sup> [ccrweb.ca/en/transportation-loans](http://ccrweb.ca/en/transportation-loans)

<sup>2</sup> Evaluation of the Immigration Loan Program, September 2015, [www.cic.gc.ca/english/resources/evaluation/ilp/2015/index.asp](http://www.cic.gc.ca/english/resources/evaluation/ilp/2015/index.asp)

the loans, and how they compound vulnerability and create stress and anxiety for recently arrived refugees.<sup>3</sup>

## **2. If the loans are not eliminated, the government should introduce more waivers**

If the loan scheme for resettled refugees is not abolished in the short term, the government should introduce additional measures to reduce the negative impacts, including a clearer and more generous process for waiving the loan in hardship cases, with a possibility of seeking a waiver both before resettlement and after arrival.

While the loan is a burden for most, if not all, refugees, for some individuals it is particularly devastating. Currently, there is some possibility of waiving the transportation loan in individual cases, but members report that there is a lack of consistency in decision-making on waivers and the level of hardship that must be established before a waiver is granted is extremely high. Individuals and families who have no reasonable prospect, in the view of CCR members, of repaying the loan are denied waivers by the government.

## **3. The proposed amendments will provide some relief**

While we do not support the proposed continuation of the loan scheme for refugees and believe that the proposed amendments are inadequate, we recognize that they provide some relief to those affected.<sup>4</sup>

We welcome the proposal to delay the start of expected repayments until after initial settlement (and after individuals have actually received a notice regarding payments!). We note however that under the proposed regulatory change, the repayment period would begin one year after arrival in Canada which, for the vast majority of resettled refugees, is the same time that they cease to be supported through the Resettlement Assisted Program or by their private sponsors. The “month 13” transition is already a stressful time for many refugees: adding new financial obligations in the form of the loan repayment at the same time is problematic.

Extending the period of expected repayment will make the monthly payments more manageable for some, and reduce the need for difficult and stressful requests to negotiate deferral or variations in payment amounts, or the legal, financial and psychological impacts of falling in arrears. Similarly, eliminating interest payments will mean a small decrease in the overall burden of the loan, and removes the particular offence of the government collecting interest from people brought to Canada on humanitarian grounds.

30 October 2017

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<sup>3</sup>

[https://sencanada.ca/content/sen/committee/421/RIDR/Reports/RIDR\\_RPT\\_SyrianResettlement\\_FINAL\\_E.pdf](https://sencanada.ca/content/sen/committee/421/RIDR/Reports/RIDR_RPT_SyrianResettlement_FINAL_E.pdf)

<sup>4</sup> In addition to the absorption, beginning 1 April 2017, of the cost of the Immigration Medical Examination and some other health-related costs through the Interim Federal Health Program.