



CCR-IRCC Discussion on PSR Intake Measures

Comments on RSD requirement

22 September 2025

Introduction

At a meeting in July 2025, CCR gave input to IRCC on plans for future intake control measures for private sponsorship applications, particularly by G5 and Community Sponsors. The CCR wishes to provide the following written comments on the RSD requirement, to complement the oral input we gave at the meeting.

CCR calls for the elimination of the RSD requirement

- CCR is opposed to the Refugee Status Determination (RSD) requirement as outlined in a [resolution adopted by our members in 2013](#). As stated in the resolution, the requirement is discriminatory because many refugees cannot get RSD or must wait a long time.
- Over the years, and till today, the CCR has consistently heard from members and G5 sponsors that the RSD requirement is a major barrier and concern. (See below)
- CCR's position remains steadfast therefore and we are calling for its elimination.

The RSD requirement excludes many refugees in need of protection and a durable solution

- The RSD requirement excludes enormous numbers of refugees who are among the most vulnerable. Palestinians in the Middle East are excluded. People in mass displacement situations, where individual determination is not possible, are excluded. RSD is not available in many countries where refugees' rights are routinely violated.
- There is arbitrariness in the requirement: refugees who have found asylum in one country may have access to RSD, while their siblings have no access because they have fled to a different country where no refugee status determination is available.
- Availability of RSD is in some situations blocked, suspended or manipulated for political reasons. For example, in Lebanon, UNHCR was required by the government to suspend recognition of Syrian refugees in 2015, leaving them only "recorded" and without legal documentation. Canada's imposition of an RSD requirement can thus replicate discriminatory measures taken by other governments against certain populations.

- Countries that are closing the door on refugees sometimes stop registration processes at the same time as introducing measures that restrict refugees' rights and even subject them to refoulement. In East Africa, for example, several countries have stopped registering refugees. There are regular reports of refugees in these countries being detained and deported, in violation of their rights. The Canadian government should recognize that the lack of availability of RSD in these countries is in fact a sign that refugees are not safe and that their need for protection in Canada is all the greater.
- Conversely, the RSD requirement includes people who may not need resettlement. In some situations, once the person has RSD, they are considered to have a durable solution because they have been granted asylum in the country where they live.

The RSD requirement prolongs refugees' insecurity and can make them less safe

- The RSD requirement also needlessly prolongs people's stay in precarious situations of displacement. People often must wait years for refugee status determination, before they can finally be sponsored by a G5 group. By the time they arrive in Canada, they may have spent close to a decade in a refugee camp or in other temporary accommodation. These years in limbo represent not only an enormous wasted opportunity for them, but also make their integration into Canadian society more difficult because of the long-term impacts of years of living without security and without access to adequate health care, education, training and legal employment.
- Recognition through RSD does not always translate into increased rights or protection. In some cases, it even restricts rights: in Lebanon, recognized refugees had to sign a pledge not to work. Moreover, some Syrian refugees chose not to seek RSD due to concerns over access to humanitarian assistance and fears about data sharing. Thus, requiring RSD as a precondition for G5/CS sponsorship does not necessarily safeguard refugees – it may in fact adversely affect their ability to survive in host countries.

The RSD requirement does not respect UNHCR's capacity or strategic direction

- Recent substantial cuts to UNHCR funding will necessarily affect the UNHCR's capacity to deliver RSD. Refugees should not be denied the opportunity for resettlement to Canada simply because the UNHCR has reduced capacity to do refugee determinations. It would be particularly unjust as the funding cuts leave refugees more vulnerable than ever, and thus even more in need of protection and a durable solution in Canada.
- Even apart from the recent funding cuts, UNHCR has moved away from reliance on individualized RSD, emphasizing diversified case processing strategies such as prima facie

recognition or simplified procedures for groups manifestly in need of protection.¹ By requiring individual RSD, the Canadian government is out of step with international best practices and UNHCR's own guidance on efficiency, fairness, and protection. It is also putting pressure on UNHCR to use their scarce resources on unnecessary RSD purely in order to allow individuals' access to a durable solution in Canada.

The absence of the RSD requirement in other contexts demonstrates that it is inappropriate

- The Canadian government is aware that many refugees who need resettlement are unable to obtain RSD – this is shown by the exemptions provided in recent years to allow G5 sponsorships of Syrians and Afghans. The more expansive list of documentation applicants can provide in the context of the Economic Mobility Pathways Pilot also confirms the government's awareness that RSD is not available to many refugees in need of a durable solution.
- Since SAHs are not subject to the RSD requirement, they face pressure to sponsor refugees who might otherwise and more appropriately be sponsored by a Group of 5.

Exit issues are not a valid reason for maintaining RSD

- RSD is not required for SAHs or for sponsorships in Quebec. The requirements for EMPP are much broader. If these programs can function without an RSD requirement, so can G5/CS sponsorships.
- RSDs anyway sometimes expire. By the time the sponsorship process finishes, the document might be expired.
- Exit requirements tend to change constantly – by the time IRCC is ready to issue a visa it may no longer be relevant whether the person has an RSD or not.
- Even if there are exit issues in some countries, it should not be used as bar in all countries.
- Exit issues should be tackled through diplomacy and active exploration of options to overcome the problem.

¹ UN Executive Committee of the High Commissioner's Programme, Refugee Status Determination, EC/67/SC/CRP.12, UN High Commissioner for Refugees (UNHCR), 31 May 2016, <https://www.refworld.org/reference/annualreport/unhcr/2016/en/112071>

Requiring the RSD does not meaningfully contribute to the quality of applications

- RSD requirement is a blunt instrument to address issues of quality. Huge numbers of refugees who meet all the requirements for resettlement to Canada do not have access to an RSD. Conversely, some people with an RSD do not qualify (for example, because they have a durable solution)
- Training is a more useful approach to improving quality.

The RSD requirement is a needless extra barrier in the context of numerical limits

- If the government goes ahead with its plan to impose numerical limits, maintaining the RSD will not contribute anything further to reducing the number of applications accepted for processing. On the other hand, it will continue to limit which refugees can be sponsored, in ways that are arbitrary and deeply unfair.
- We know that numerical limits are already a matter of great concern with the G5 sponsorship community. The government should at a minimum recognize the evidence and concerns put forward by the sector about the RSD and, in the spirit of partnership and good policy, eliminate the requirement.