

MIGRANT RIGHTS NETWORK

Hon. Monte McNaughton
Minister of Labour, Immigration, Training and Skills Development
9th Flr, 400 University Ave, Toronto, ON M7A 1T7
Minister.MLTSD@ontario.ca

December 6, 2022

Dear Minister McNaughton,

There is an estimated half a million undocumented people in Canada, with the majority likely residing in Ontario. They live and work in Ontario, but are unable to access basic services, and unable to assert their rights at work, or when they face exploitation. Ontario has an opportunity right now to support a regularization program that would ensure justice, equality and fairness for hundreds of thousands of Ontarians.

In February 2013, then-City of Toronto Councillor Doug Ford voted in favour of [CD18.5](#) - Undocumented Workers in Toronto Motion that re-affirmed Toronto's commitment to ensuring access to services without fear to immigrants without full status or without full status documents. Toronto City Council also agreed to "request the Federal government to establish a regularization program for undocumented residents".

Nearly a decade later, such a regularization program is on the horizon. On December 16, 2021, Prime Minister Trudeau made a [mandate letter commitment](#), and the federal government is currently consulting with all provinces and territories, including Ontario.

We are migrant organizations, immigration services, labour unions and civil society organizations based in Ontario, part of Migrant Rights Network - Ontario. This letter has been endorsed by over 39 organizations in Ontario. We are writing to you today to support a comprehensive and inclusive regularization program which ensures:

- All 500,000 undocumented people in Canada and their families (without exclusions of any kind) are given permanent residency;

- All undocumented people must be able to apply for permanent residency, and be issued work and study authorizations as they await processing of their permanent residency applications;
- An immediate stop to detentions and deportations so that migrants are not deported before they can apply; and free and accessible applications; and
- Ongoing regularization so that those who become undocumented in the future can get permanent resident status. The entire immigration system must be transformed to ensure permanent resident status for all migrants so that no one becomes undocumented in the future.

We support the proposal developed by Migrant Rights Network:

www.migrantrights.ca/resources/regularization-in-canada.

There is unanimous support for this approach to regularization. Almost every key civil society, labour, health and environmental organization has joined our call for full and permanent immigration status for all - nearly 500 organizations. [Major organizations from across Canada have also written letters](#) to PM Trudeau supporting this regularization proposal.

Permanent resident status is the mechanism through which all other rights are accessed. By supporting a comprehensive regularization program, Ontario would:

- **Address a historic wrong:** A comprehensive program would ensure that you are remembered for supporting life-altering public policy, which corrects an historic wrong. A fair society with equal rights is only possible if everyone has the same immigration status.
- **Be part of ending systemic racism and ensuring gender equality:** Undocumented people are mostly racialized, low-waged people, often women. Ensuring rights and access for them is part of implementing anti-racist policy and gender equality.
- **Ensure improved labour conditions:** Employers of undocumented workers threaten them with deportations to stop them from asserting their rights. This abuse results in overall worsening of working conditions in the labour market. While bad employers prosper, good employers who may be unable or unwilling to hire workers informally or for cash payments are excluded.
- **Ensure public health:** Undocumented migrants often do not access healthcare until it is absolutely necessary due to the cost. By the time they do, their health conditions are much more complicated, and the burden on the healthcare system is much higher.
- **Create more effective social policy:** Currently, there are no reliable statistics on undocumented people in Canada. An inclusive regularization program will ensure that non-status people enter into everyday life, allowing for more informed and effective social policy to be created.
- **Grow the economy at greater rates than cost of processing or settlement services:** Most non-status people pay taxes but their employers, many of whom are very profitable businesses, do not pay statutory remittances. Regularizing 500,000 undocumented people will increase employer CPP and EI contributions by at least \$1.1 billion, just in the

first year. As undocumented people achieve stability through permanent residence, they will lay down roots, purchase assets of greater value, and spend more on Main Street.

- **Create labour mobility to address shortages where they exist:** Undocumented people live and work here. Many are in cash-based jobs, or are under- or unemployed. Regularizing all undocumented migrants will increase their labour mobility, unlocking their skills and experience enabling them to move and take on whichever jobs have openings.
- **Build on best practices around the world:** Between 1996 and 2008, 24 of the 27 EU Member States implemented regularization programs, and some several times. An estimated 5.5 to 6 million people were regularized in that time. The largest were the Italian 2002 program that regularized 634,000 people and the Spanish 2005 program that regularized 578,375 people. Ireland regularized almost all undocumented people in the country this year who met a basic residency requirement.

Please contact Syed Hussan (hussan@migrantworkersalliance.org, 416-453-3632 if you have any follow-up questions.

Thank you in advance for your support and consideration.

The Migrant Rights Network - Ontario is the Ontario wing of Migrant Rights Network, Canada's largest cross-country, migrant-led coalition. Our membership is composed of people without permanent resident status - workers, students, undocumented people, refugees and families.

Members

Butterfly – Asian and Migrant Sex Workers Project

CCESO – Careworker Connections and Educational Support Organization

Chinese Canadian National Council – Toronto

Collaborative Network to End Exploitation

FCJ Refugee Centre

GABRIELA-Ontario

IAVGO Community Legal Clinic

Income Security Advocacy Centre

Migrant Resource Centre Canada

Migrant Workers Alliance for Change

Migrante Ontario

No One Is Illegal – Toronto

Northumberland Community Legal Centre

OCASI – Ontario Council of Agencies Serving Immigrants

Parkdale Community Legal Services

Sanctuary Students Solidarity & Support Collective (S4)

Unifor

Vivimos Juntos, Comemos Juntos

Workers' Action Centre

CC:

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This letter is also endorsed by:

Axelle Janczur, Executive Director, Access Alliance Multicultural Health and Community Services
Kelly Bowden, Director of Policy, Advocacy and Government Relations, Action Canada for Sexual Health and Rights
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Nasima Akter, Executive Director, Bangladeshi-Canadian Community Services (BCS)
Leonilda Bastone-Patey, Executive Director, Catholic Community Services York Region
Nathan Prier, Member, Child Care Now (Ottawa)
Roy Brady, Chapter Chairperson, Council of Canadians, Peterborough and Kawarthas Chapter
Prasanna Balasundaram, Executive Director, Downtown Legal Services
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Janet Butler-McPhee, Co-Executive Director, HIV Legal Network
Kerry Duncan, Collective member, Justice for Workers Niagara
Michael Harris, Executive Director, KEYS Employment & Newcomer Services
Lucia Harrison, CEO, Kitchener-Waterloo Multicultural Centre
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Andy Cragg, Executive Director, New Canadians Centre Peterborough
Aidan Johnson, ED, Niagara Community Legal Clinic
Emily Kovacs Kovacs, Executive director/CEO, Niagara Folk Arts Multicultural Centre
Mo Constantine, Founder, Niagara Reproductive Justice
Samira Kanji, President, Noor Cultural Centre
Kerry Duncan, Volunteer, Planning, & Training Coordinator, OPIRG Brock
Laura Thompson, President, OPSEU Greater Toronto Area Council , OPSEU Greater Toronto Area Council Executive
Baldev Mutta, Punjabi Community Health Services, Punjabi Community Health Services
Richard Lee, Executive Director, S.E.A.S. Centre
Molly Kraft, Coordinating Team member , Showing up for Racial Justice - Toronto
Peter Hogarth, Member of coordinating committee, Spring Magazine
Bill Sinclair, President and Chief Executive Officer, The Neighbourhood Group Community Services
TNO-The Neighbourhood Organization
Amelia Rose Khan, Volunteer, Toronto350
Jennifer Hollis, Executive Director, WIL Counselling and Training for Employment (WILL Employment Solutions)
Rola Hamdan, Community Legal Worker, Paralegal & Notary Public, Willowdale Community Legal Services
Lori-Ann Green-Walker, Executive Director, Women's Health in Women's Hands CHC
Marcie Ponte, Executive Directo, Working Women Community Centre

Shamira Madhany, Managing Director, World Education Services
Heather McGregor, Chief Executive Officer, YWCA Toronto