

2018

Canadian Postdoctoral Immigration Report

Written Submission for the IRCC's Consultation with Stakeholders on Immigration and
Work Authorization Policies and Programs in the Academic Sector

By:



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Stagiaires Post-doctoraux (CAPS/ACSP)

INTRODUCTION

The Canadian Association of Postdoctoral Scholars (CAPS/ACSP) represents the interests of the thousands of postdoctoral scholars working in Canada and it is our pleasure to provide input to the IRCC on behalf of this important, and too often overlooked, stakeholder group with respect to their immigration and work authorization needs.

Postdoctoral scholars / fellows (aka: ‘postdocs’) are highly educated and skilled individuals who hold a PhD, MD, or equivalent degree and engage in research, teaching, and other scholarly activities across all academic disciplines in Canada’s top universities and research institutions, as well as conducting research in non-academic settings including industry, government, and not-for-profit organizations. Postdocs are an essential component of Canada’s knowledge-based economy, as they play a key role in research and innovation in most major, publicly-funded research institutions. As early-career researchers, postdocs work under the guidance / mentorship of a supervisor, who is often a tenured faculty member at a university or a senior researcher in non-academic settings. Postdocs are not students (although they are still rarely classed as such by some provinces/institutions), as they do not complete coursework towards a degree or pay tuition, and they spend the majority of their time working – i.e., conducting research and engaged in other scholarly activities (e.g., teaching and training undergraduate and/or graduate students). However, postdocs are considered trainees, as this temporary position typically involves a significant amount of on-the-job training, which is meant to enhance the skills and experience of these highly qualified personnel towards a faculty or research career in academia or (far more often) a career outside academia that is suitable to their level of training and related talents. The postdoctoral position is perhaps best thought of as an apprenticeship, during which doctorate holders gain the additional skills and experience necessary to be competitive for careers in the modern research ecosystem and beyond.

Based on a sample of institutional response rates to the CAPS/ACSP 2016 National Postdoctoral Survey, we estimate that there were approximately 10,000 postdocs working in Canada in 2016. Given that 29% of current postdocs on that survey were international postdocs holding a work permit (Jadavji et al., 2016), this translates into roughly 3,000 international postdocs working in Canada at that time. Those numbers are rough estimates, as the precise number of postdocs in Canada remains a question that has not been adequately addressed to date.

In comparing the proportion of international postdocs on work permits who responded to our 2016 survey with the same data from our earlier surveys, conducted in 2009 (Stanford et al., 2009) and 2013 (Mitchell et al., 2013), it is clear that the proportion of international postdoc respondents declined rather dramatically, from 38% to 29% between 2013 and 2016 (**Table 1**). As there is no reason to expect the survey response rate for international postdocs to change that much in such a short period, these results suggest that the recruitment and/or retention of international postdocs dropped precipitously in that 3 year span. The introduction of the Express Entry (EE) system in January 2015 may have contributed to this, as the implementation of EE made it more difficult for international postdocs to gain Permanent Residence (PR; see Recommendation #1 on page 32 for more information). The decreased PR opportunities for postdocs would have directly led to increased attrition by international postdocs already in Canada and may have decreased recruitment as well, given that some people would be less

inclined to move to Canada if they no longer felt like staying here was a realistic option should they wish to do so.

Table 1: Overview of National Surveys and Respondent Demographics (adapted from Sparling & Jadavji, 2016)

| | 2009 | 2013 | 2016 |
|----------------------------|--|--|--|
| No. of respondents | 1,192 | 1,830 | 2,109 (1,630 current postdocs) |
| Nationality | 44% Canadian 17% Permanent residents 39% Work permit | 47% Canadian 15% Permanent residents 38% Work permit | 57% Canadian 13% Permanent residents 29% Work permit |
| Partner | 48% | 69% | 60% |
| Dependents | 29% | 35% | 30% |
| Multiple dependents | 13% (43% of parents) | 16% (46% of parents) | 15% (50% of parents) |

Many international postdocs come to Canada with an eye to possibly settling here permanently, and these people tend to assume that doing a postdoc is an ideal avenue for gaining the years of skilled work experience required for immigration. Indeed, the majority of international postdocs on our 2016 survey indicated that they were not planning to leave, as 39% planned to stay after their postdoc and another 39% were unsure whether they would stay/leave. In open-ended comments on the survey, many of the individuals who indicated that they were unsure whether they would stay/leave expressed a desire to stay and concerns that they would eventually be forced to leave due to immigration issues or the lack of job prospects for PhDs in Canada.

International postdocs face a variety of challenges not experienced by domestic talent in Canada, and while those challenges vary depending on how long a postdoc has lived in this country, it is worth noting that “visa and work permit issues” are consistently cited as a challenge by ~50% of this population regardless of when they arrived in Canada (Jadavji et al., 2016). The fact that only 7% of respondents on our 2016 survey indicated that they had access to legal/visa services through their institutions suggests that the need for information and support around immigration (and particularly PR) has largely gone unanswered in the academic sector to-date. That heightens the need for clear, correct, and consistent communication from the IRCC and the requirement for support regarding work permits and PR for international postdocs in Canada.

The immigration of international postdocs is a key component of the internationalization of Canadian research as these people bring skills and knowledge from across the globe to Canada, as well as international links for future research partnerships and collaborations. As such, we felt that this topic deserved a more thorough investigation than any included in our previous surveys. Towards that goal

we conducted a rather thorough immigration survey from July 16th to August 3rd, 2018 and here we present a portion of the results from that survey as evidence to support our later recommendations.

2018 CAPS/ACSP CANADIAN IMMIGRATION SURVEY RESULTS

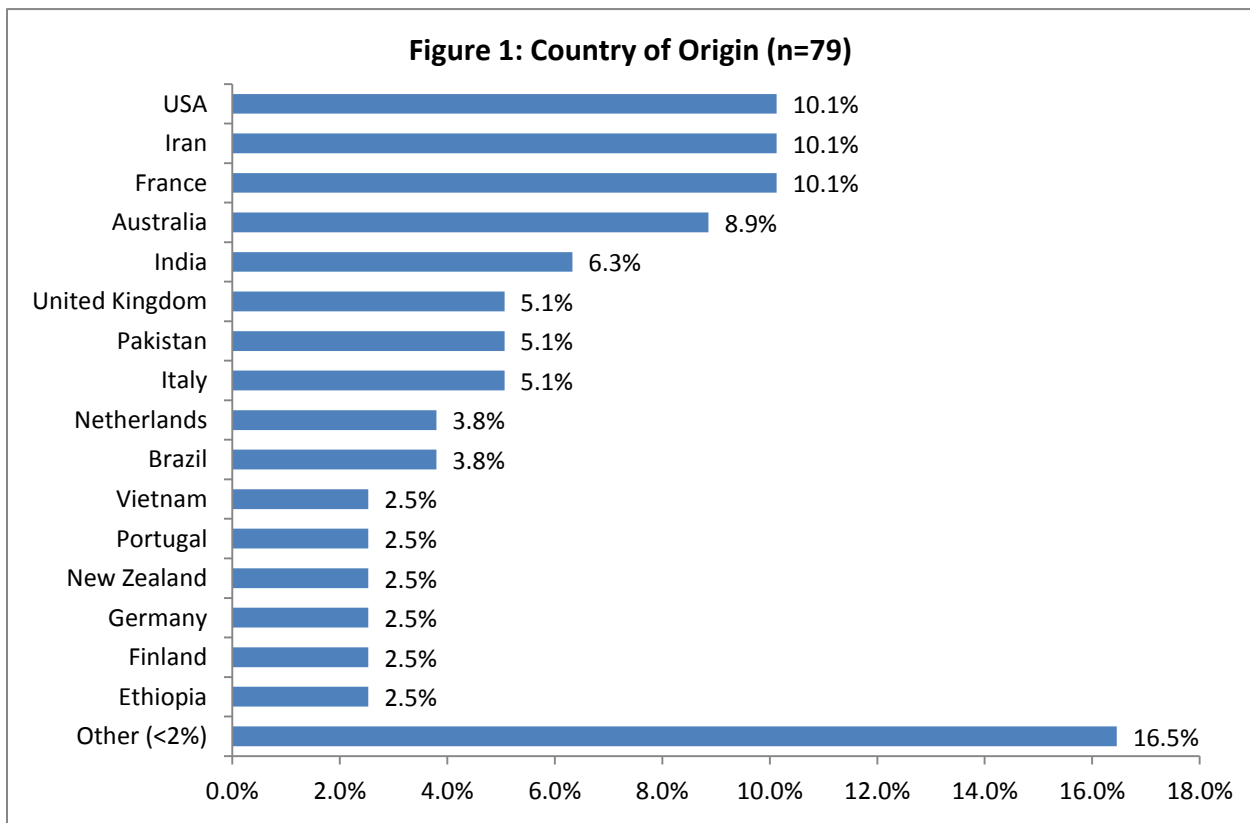
1 – RESPONDENT DEMOGRAPHIC INFORMATION

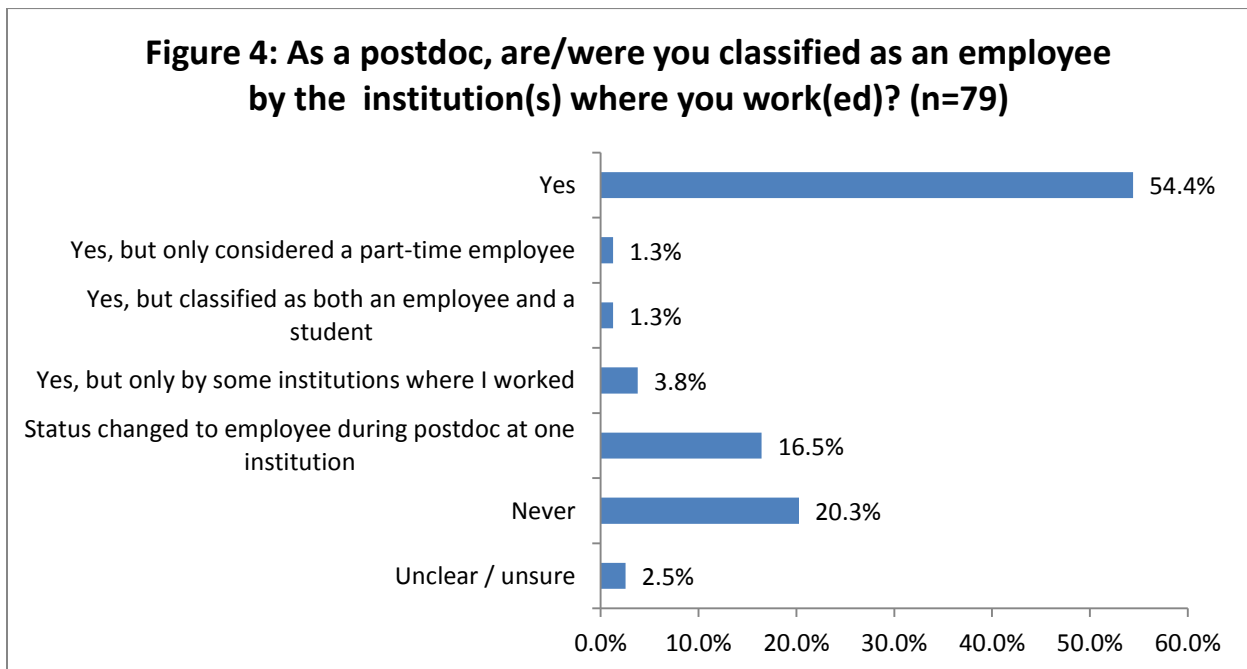
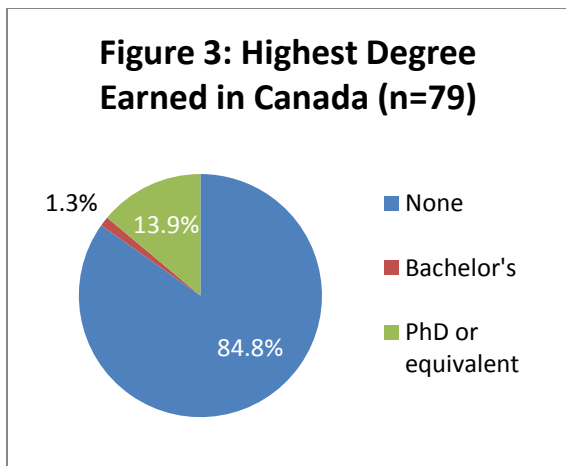
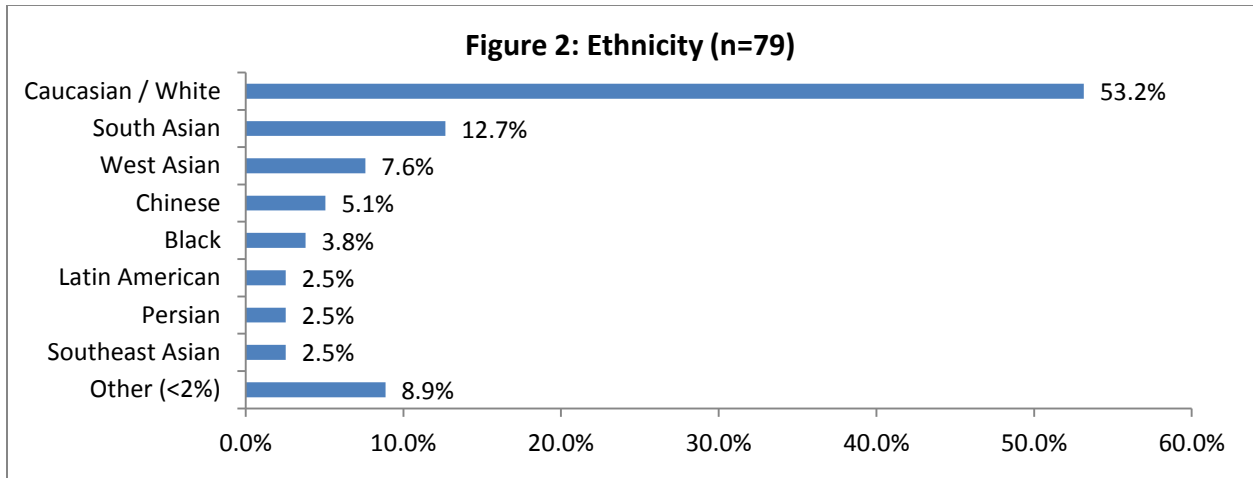
79 respondents in total

86% Current postdocs / 14% Former postdocs

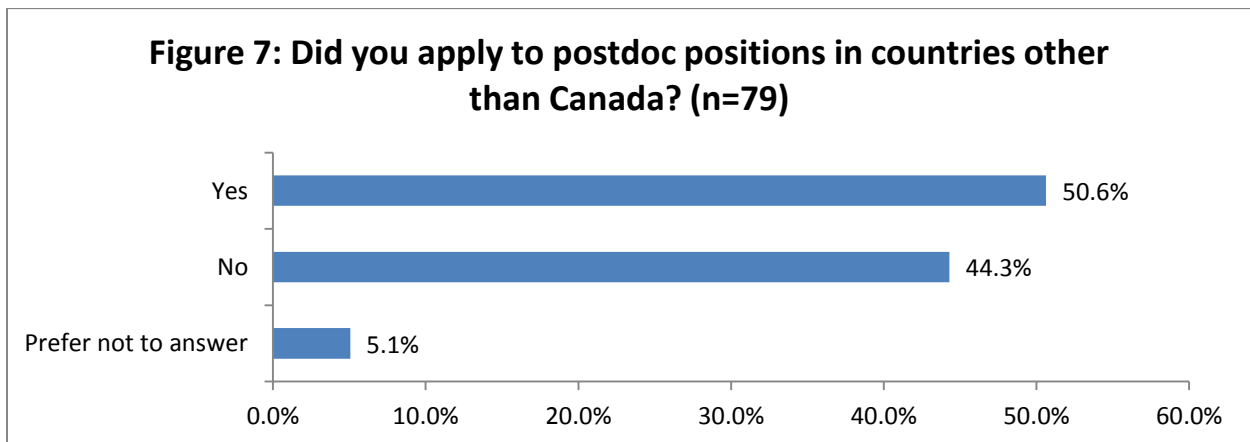
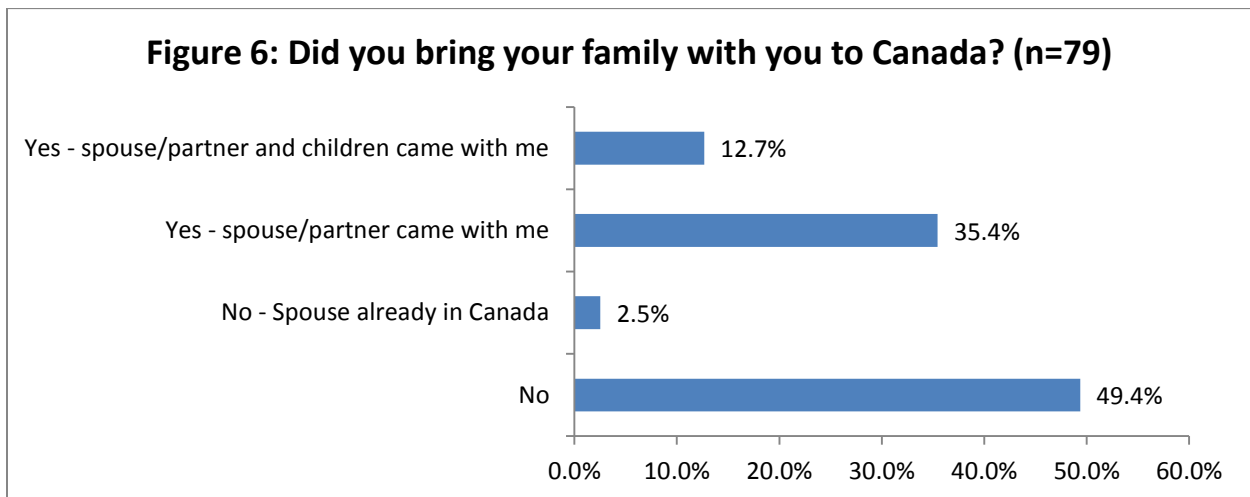
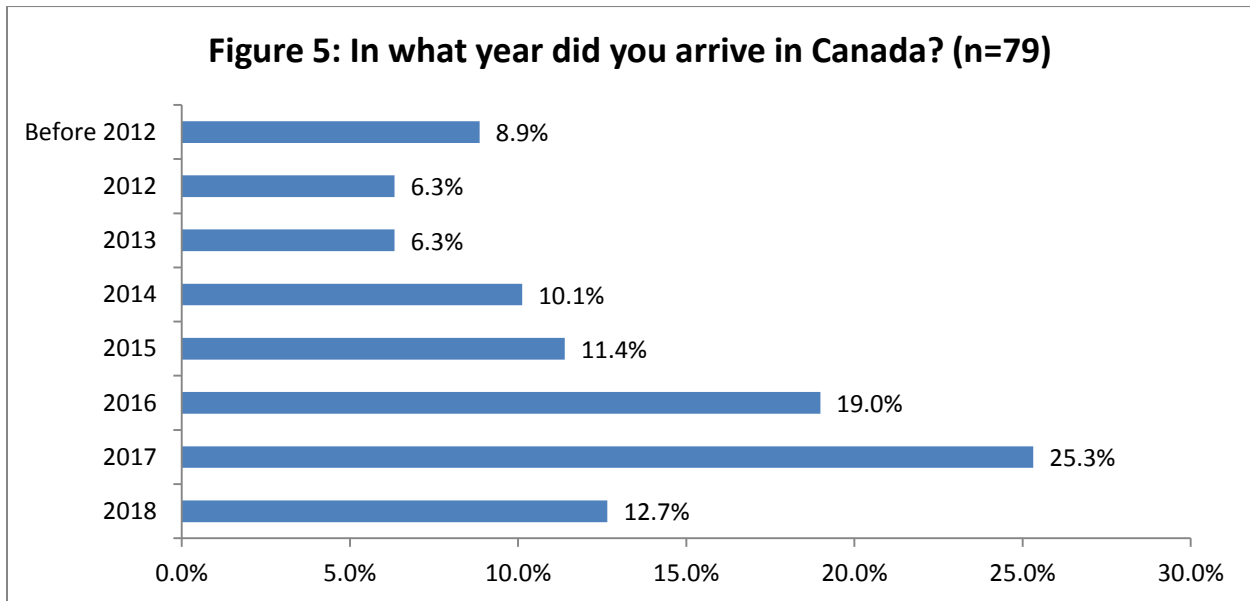
95% reside in Canada now / 5% reside elsewhere

3% Citizens; 23% PR; 71% international postdocs on work permits





2 – MOVING TO CANADA



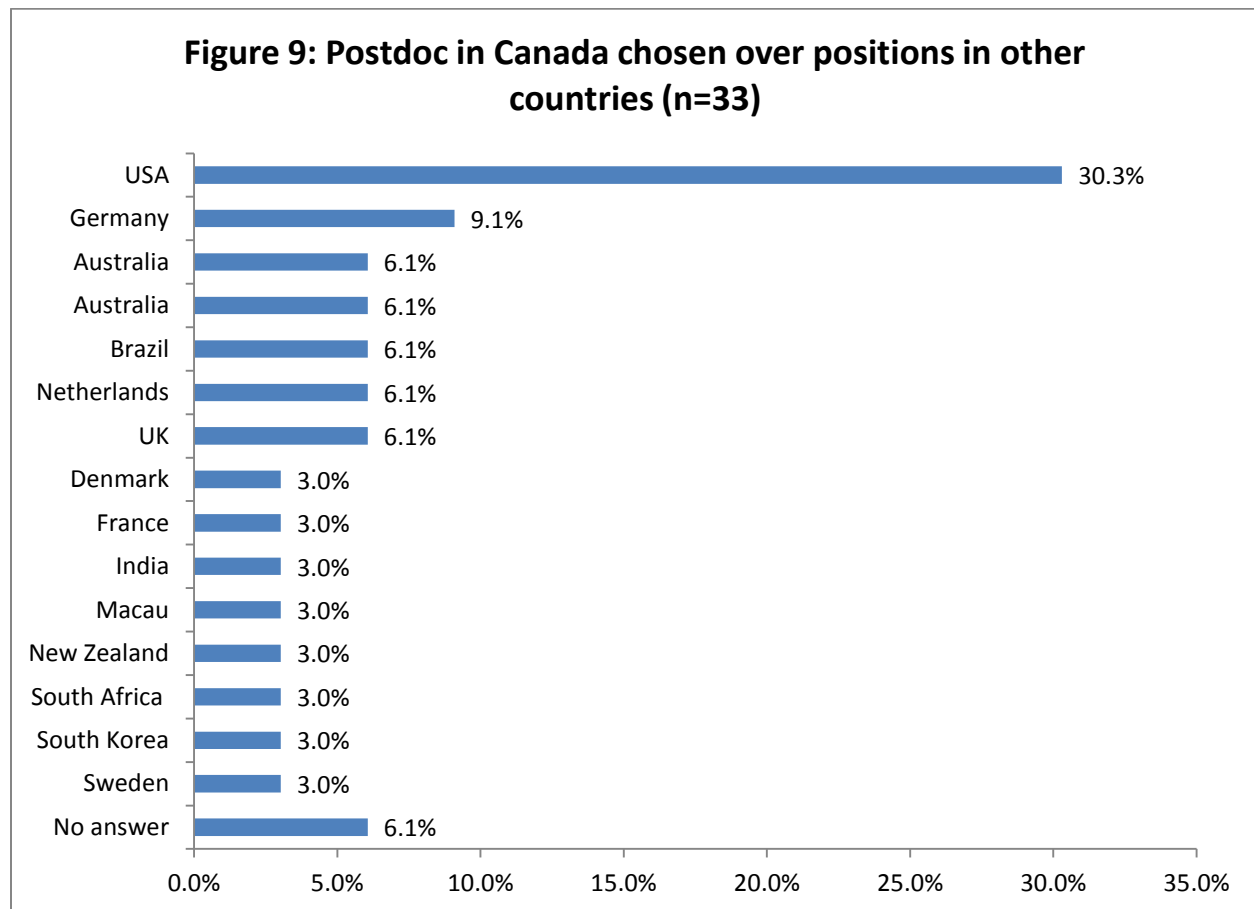
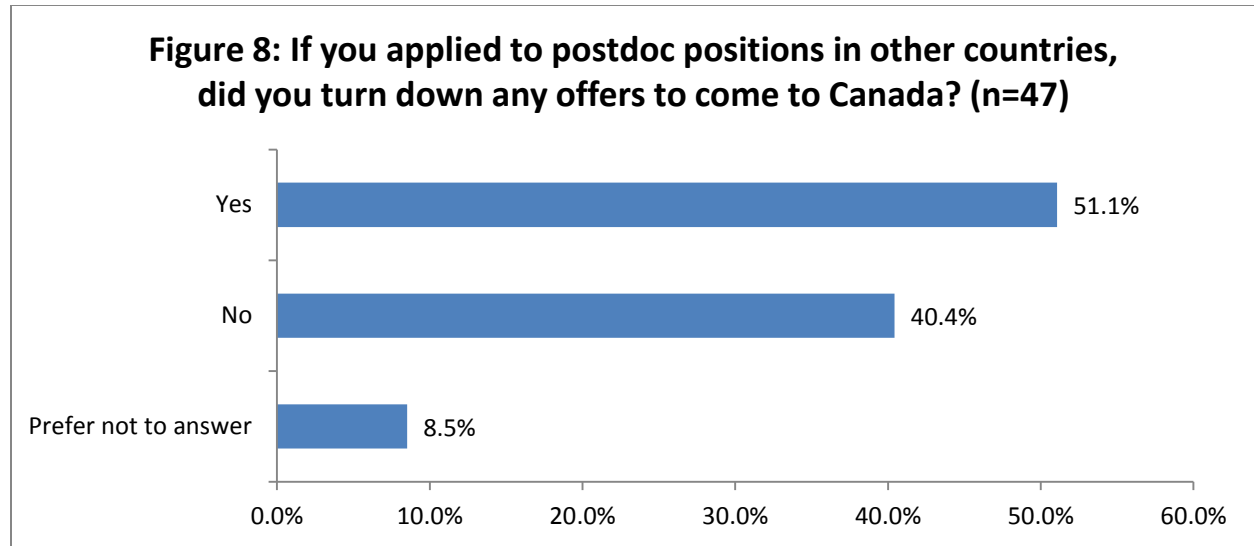
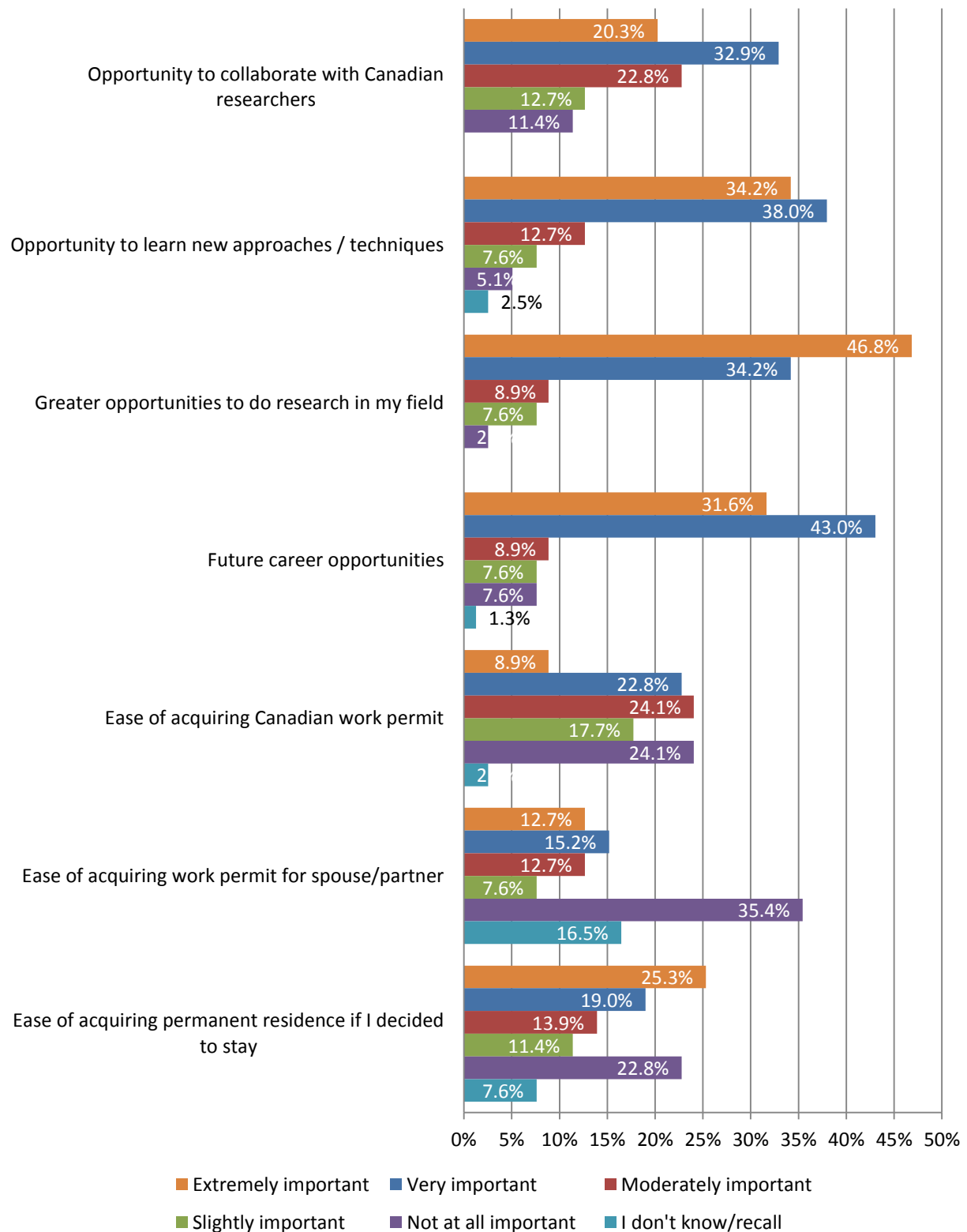


Figure 10: How important were each of the following factors in your decision to pursue a postdoctoral position in Canada?



Challenges Experienced by International Postdocs in Canada

| Challenge Experienced | Percent of Respondents |
|--|------------------------|
| Visa/work permit issues for postdoc | 41.8% |
| Difficulty attaining PR | 32.9% |
| Visa/work permit issues for spouse/partner | 7.6% |

Open-ended Comments from Respondents Regarding Challenges:

“Harassment from my first supervisor, who made use of my situation of vulnerability as a migrant. I could say nothing as I needed to renew my visa (work permit) and I needed all docs for the PR.”

“Lack of support/contact person at my institution re: immigration. Was explicitly told I had to 'sort it all myself'.”

What has been the most negative aspect of your experience immigrating to Canada? [optional]

22 out of 52 “most negative experiences” mentioned immigration policies/procedures.

Work permit and PR processing delays and wait times mentioned by about half of those people.

Issues regarding the lack of appropriate information and support for WP and PR at the institutional level was the next most popular topic.

Sample comment:

“Yearly work permit renewals when renewal sometimes took several months (longest I waited was 6 months, shortest was 1 month). You are not supposed to leave country while waiting for renewal, so this was very stressful.”

3 – WORK PERMIT APPLICATIONS

83.5% (66 people) applied for a work permit in the last 3 years

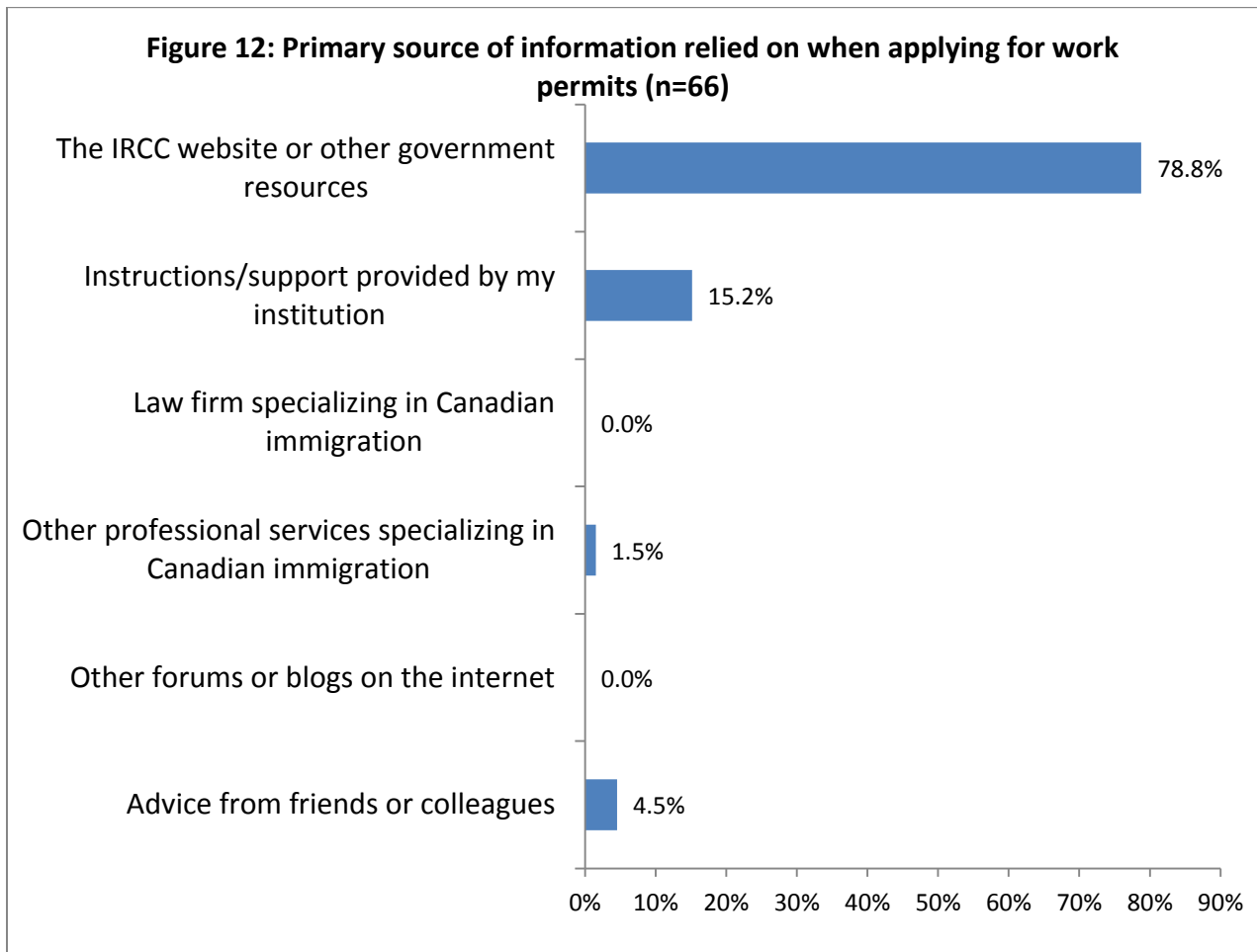
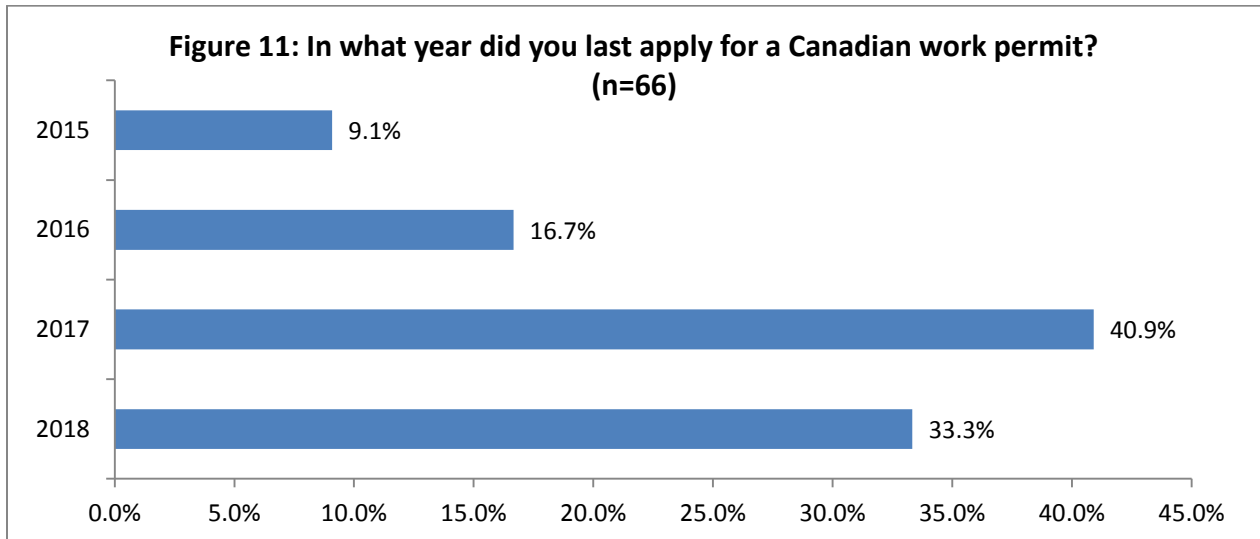
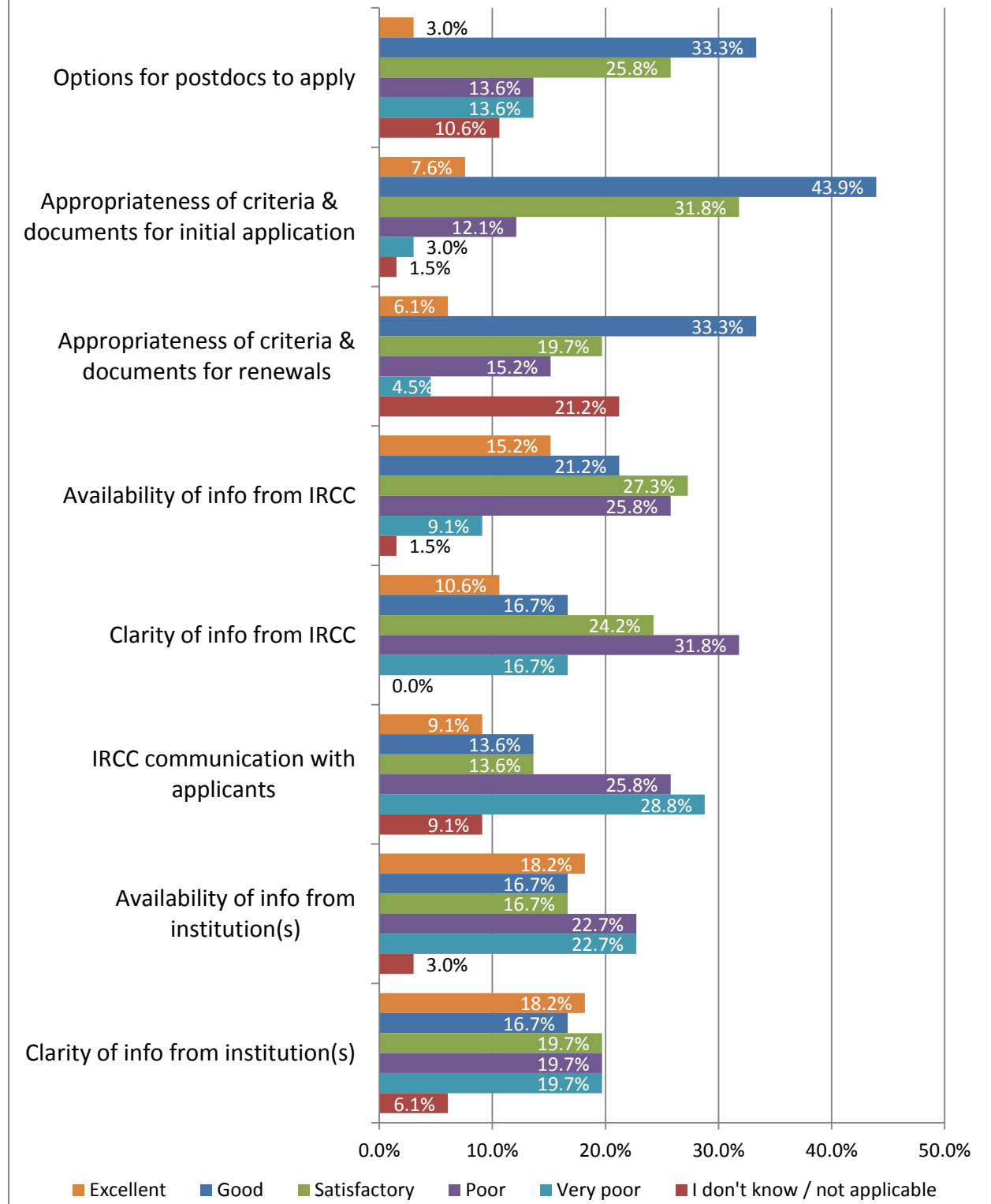
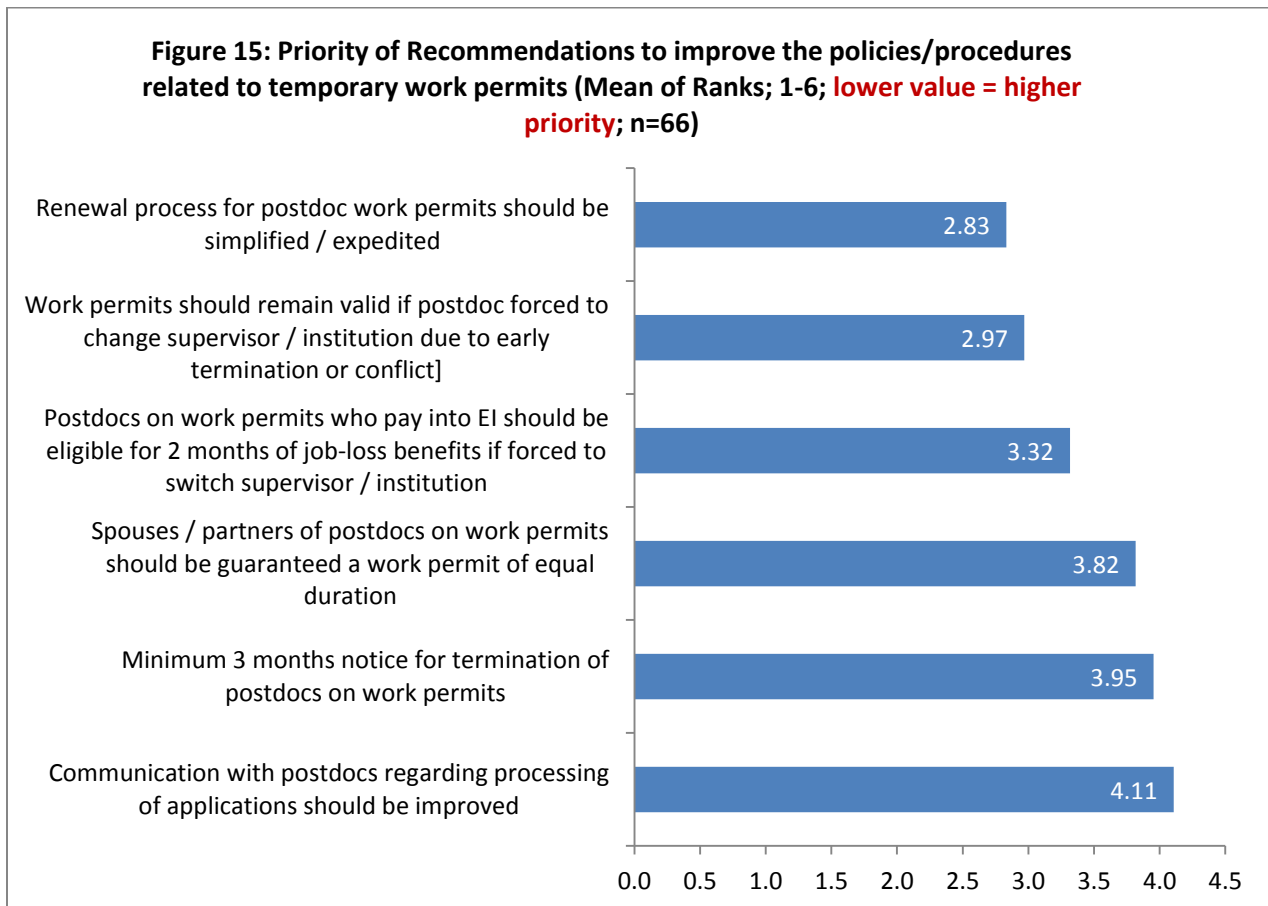
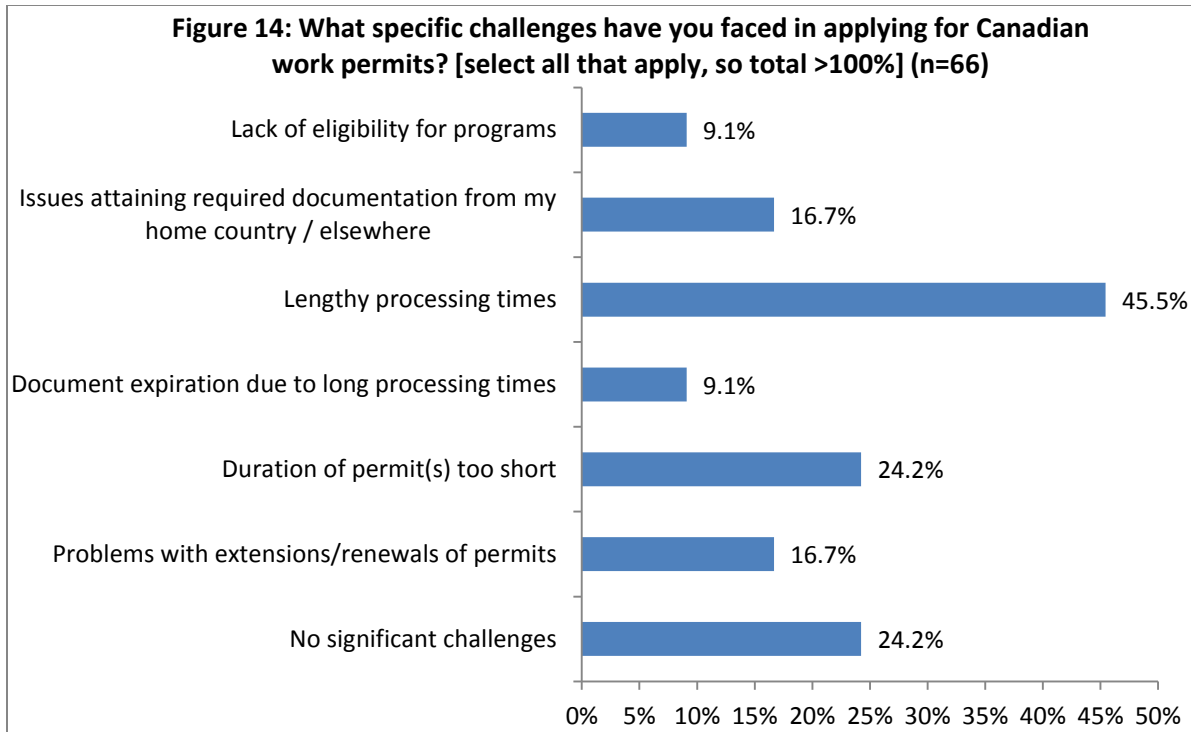


Figure 13: With respect to the policies and procedures related to work permits for international postdocs in Canada, how would you rate the following? (n=66)





Other recommendations to improve policies/procedures related to temporary work permits for postdocs in Canada

Improving information and support provided by Canadian institutions:

“Canadian universities need to be better informed & trained about the immigration process for international postdocs. The purpose of the LMIA exemption is to streamline the whole process and make it easier to obtain a work permit, in an effort to attract more postdocs to Canada. However, in my experience, the universities do not know about the LMIA process, and it takes them months to prepare the paperwork that we need to submit my work permit application... I was in Canada already, changing from one postdoc to another, and during this 5 months I was left without compensation and unable to work for my new employer.”

“...More than once, I've received conflicting information from 2 different people in HR-Immigration. This is unacceptable.”

“My University had no idea how to help me with getting a work permit and gave me wrong information, resulting in being unemployed for several months while waiting for my permit (we quit our jobs in preparation for the move, then our work permits didn't come for 5 months)”

Improving communication with applicants:

“There needs to a point of contact for postdocs to ask IRCC questions about the process. There really is only the information available on the website, and when you call the IRCC hotline the agents I spoke to are not aware of the rules and regulations specific for postdoc work permits.”

“Perhaps creating an email address specifically for postdoc work permits that is checked daily so we can get our questions answered.”

“More flexibility to extend the permit when applying on basis of a simple contract extension would be preferable. I obtained funding from the Canadian government to perform my research, and as a 'reward' I had to apply for a permit extension which cost me about 500 dollars. That just feels unfair.”

“Having material on the IRCC website specifically geared towards obtaining a work permit for a postdoc position would be useful...”

“Options for communicating about the status of work permits (from outside of Canada) should be improved. Our ONLY option for communicating about our permit application was by email, which had a minimum 10-day turnaround - a phone number we could call would have made a huge difference.”

“Set up an easy way to have an in-person appointment with an immigration officer”

“The IRCC does not provide consistent feedback from their Call Centre. They should have one point of contact, similar to Australia immigration office where one agent handles entire case, and we know who that agent is.”

Simplifying and expediting work permit renewals

“It shouldn't be easier to obtain a work permit at the border than it is to renew online.”

“It would be best if initial work permit was for 3 years, regardless of length of contract. That would reduce the wait times for renewals, as some of us wouldn't be forced into renewing every single year.”

“Proof of past employment in last 10 years is hard to obtain for early career scientists... Ideally the required documents would be simplified (e.g. only required to provide documents for positions held

after obtaining PhD, or only for positions held for more than e.g. 12 months)”

“Renewal should be a simple process, not take way longer than the initial application. It can put people in difficult situations when they are already in the country”

STAYING IN CANADA?

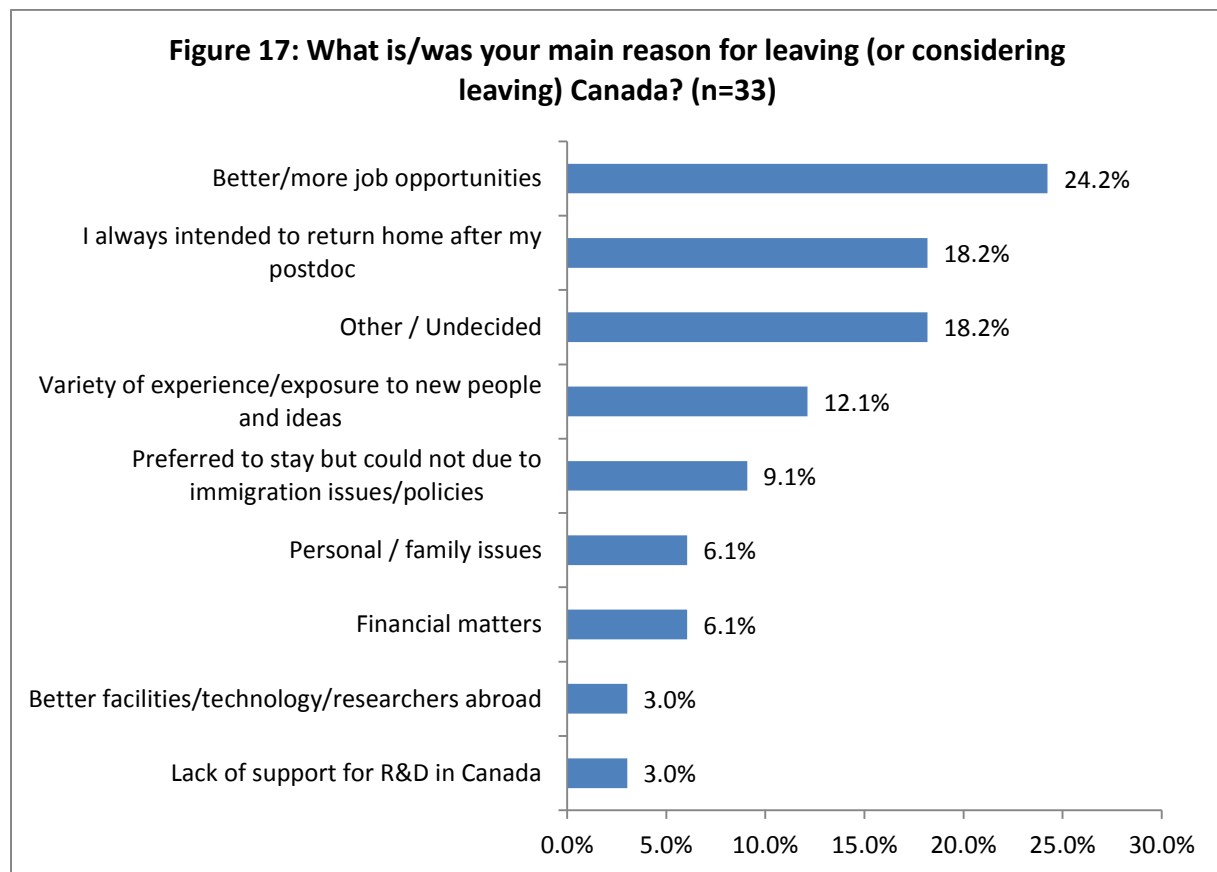
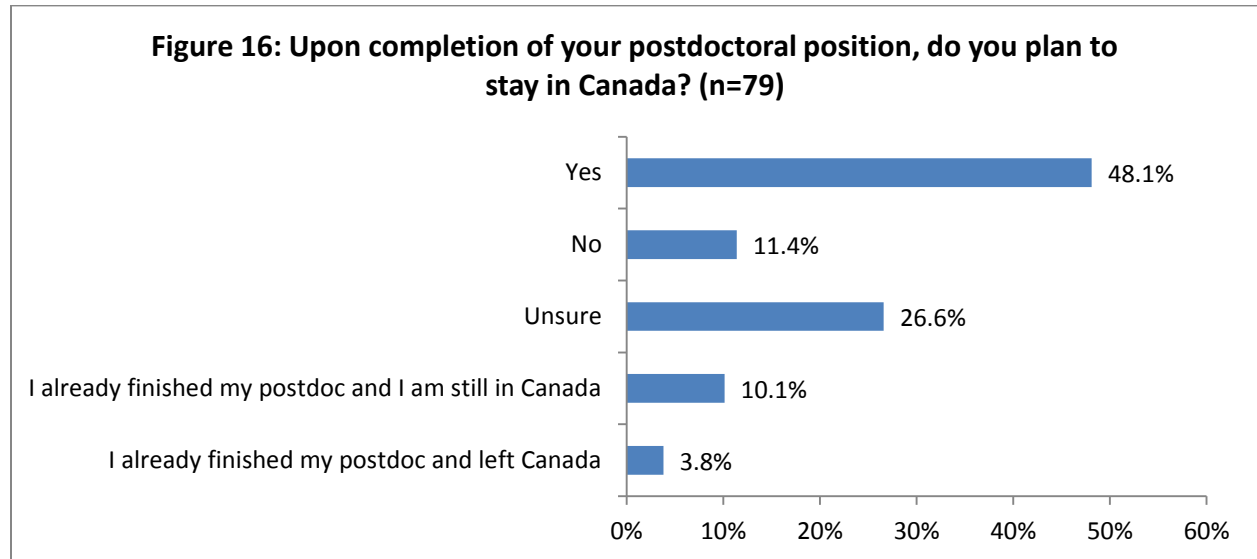


Figure 18: What other factors did/do play a significant role in that decisions for you? [select all that apply, so total >100%] (n=33)

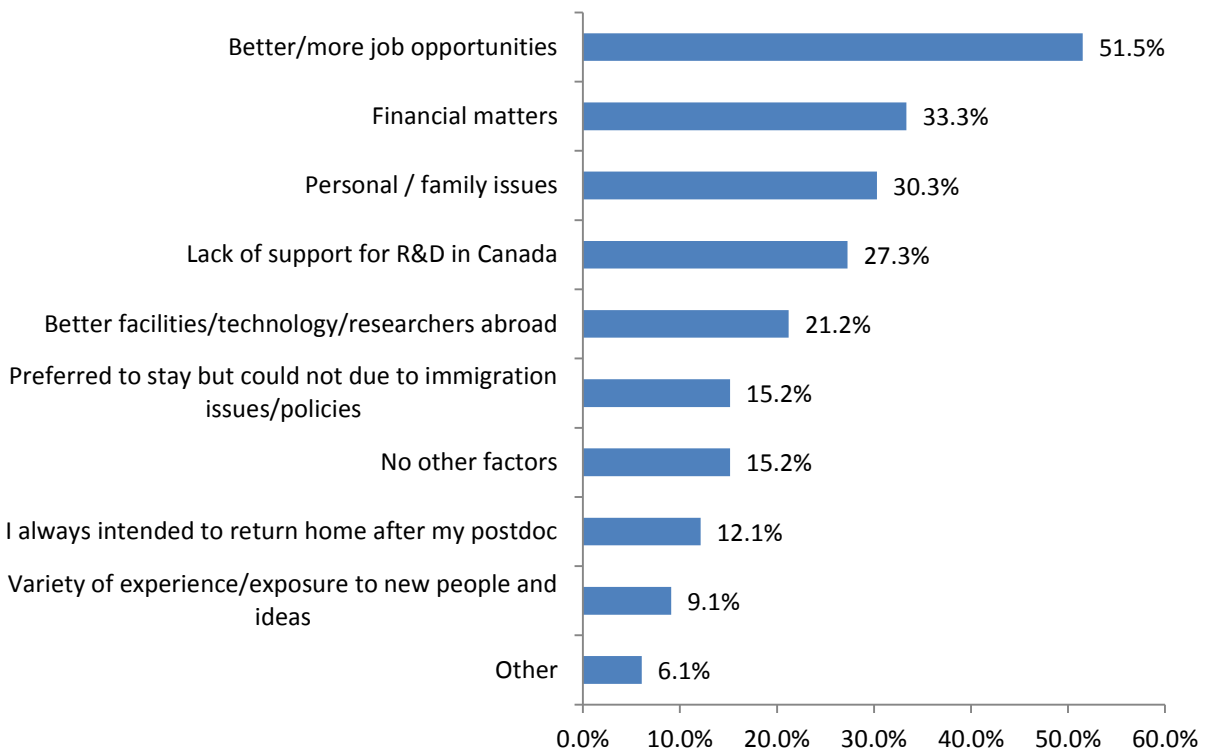
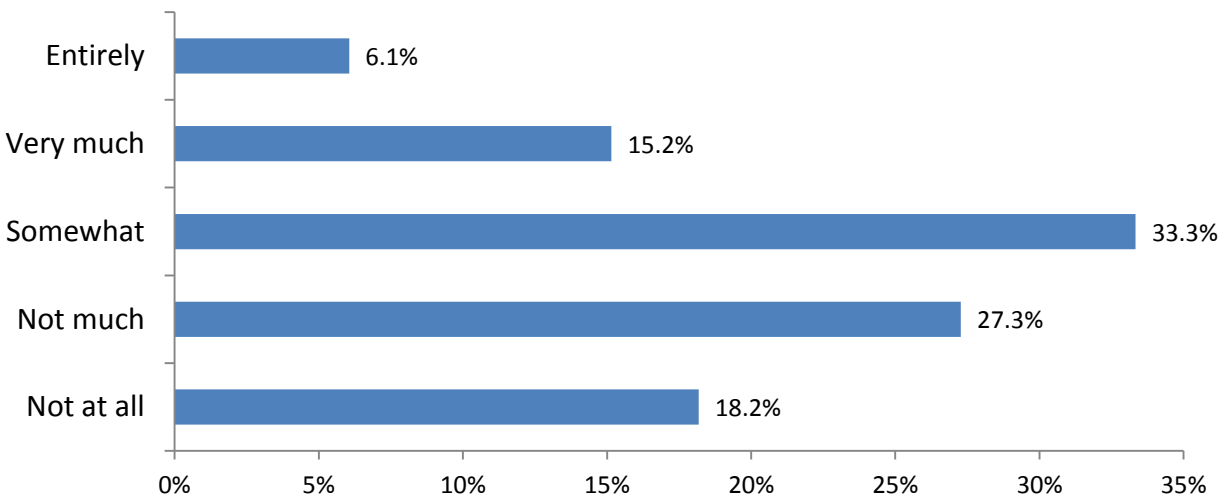


Figure 19: How much is/was your decision to leave Canada influenced by immigration issues/concerns? (n=33)



If your decision to leave Canada is/was strongly influenced by immigration issues/concerns, please briefly describe the reasons here. [optional]

“A faster residency will bring more certainty to the whole choice of staying or not”

“Can't apply for independent NSERC funding as a foreigner (and most jobs indicate a preference for citizens/permanent residence holders), and getting permanent residency is costly, time-consuming, and I decided it was not worth it just to be eligible for funding - I like Canada but have no strong preference, and decided to leave as there are more opportunities elsewhere with fewer such restrictions.”

“I am afraid that not being considered an employee by my university in Canada will not allow me to score enough points to obtain a permanent residence.”

“I don't have the money to apply for PR and don't want to keep dealing with work permit renewals or changes.”

“My PR application was denied because "they could not find enough evidence that I [was] a highly skilled worker". This was insulting, and extremely costly.”

4 – PERMANENT RESIDENT APPLICATIONS

31.6% (25 people) applied for PR since Jan 1, 2015

15.2% (12 people) are in the process of applying at the time they completed the survey

53.2% (42 people) have not applied for PR since Jan 1, 2015

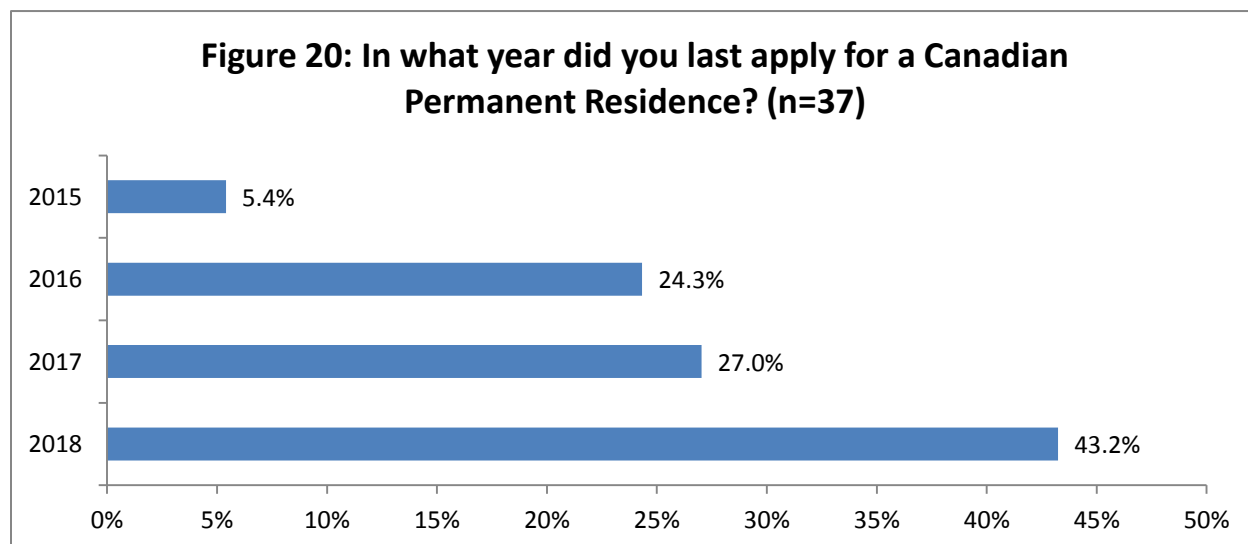


Figure 21: What is/was the primary source of information you rely/relied on when applying for PR in Canada? (n=37)

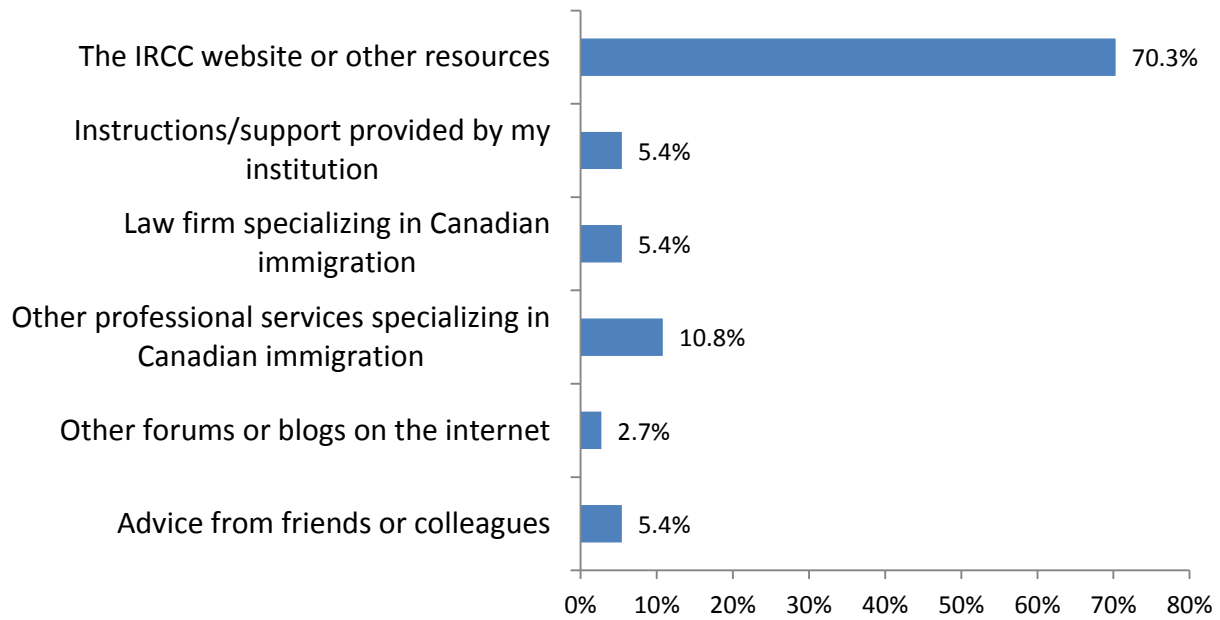
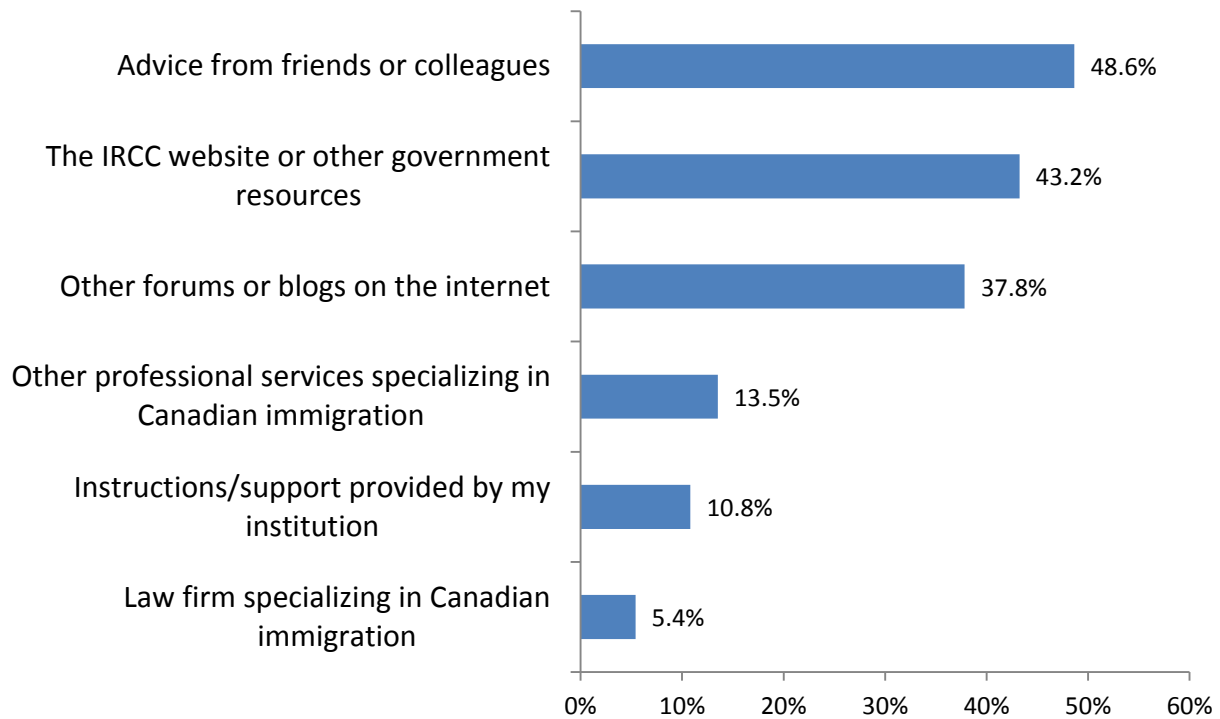


Figure 22: What other sources of information have you relied on (to a lesser extent) when applying for PR in Canada? (n=37)



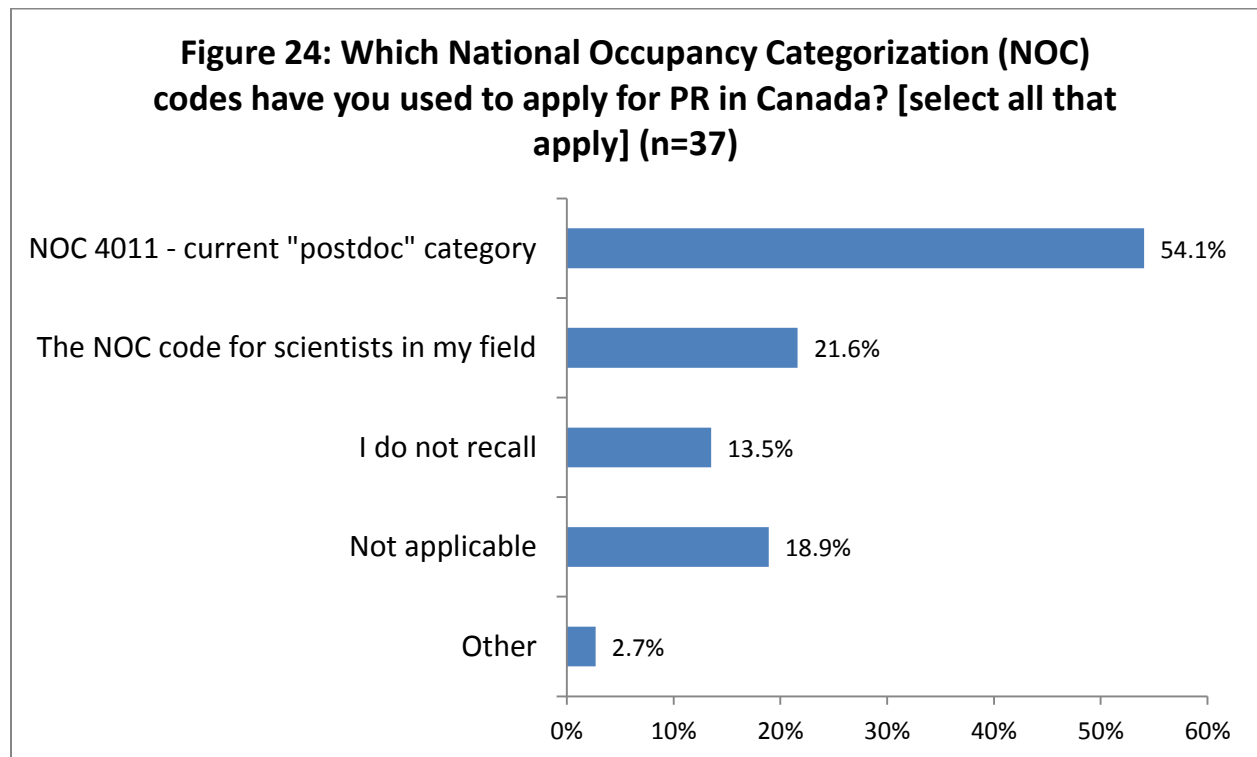
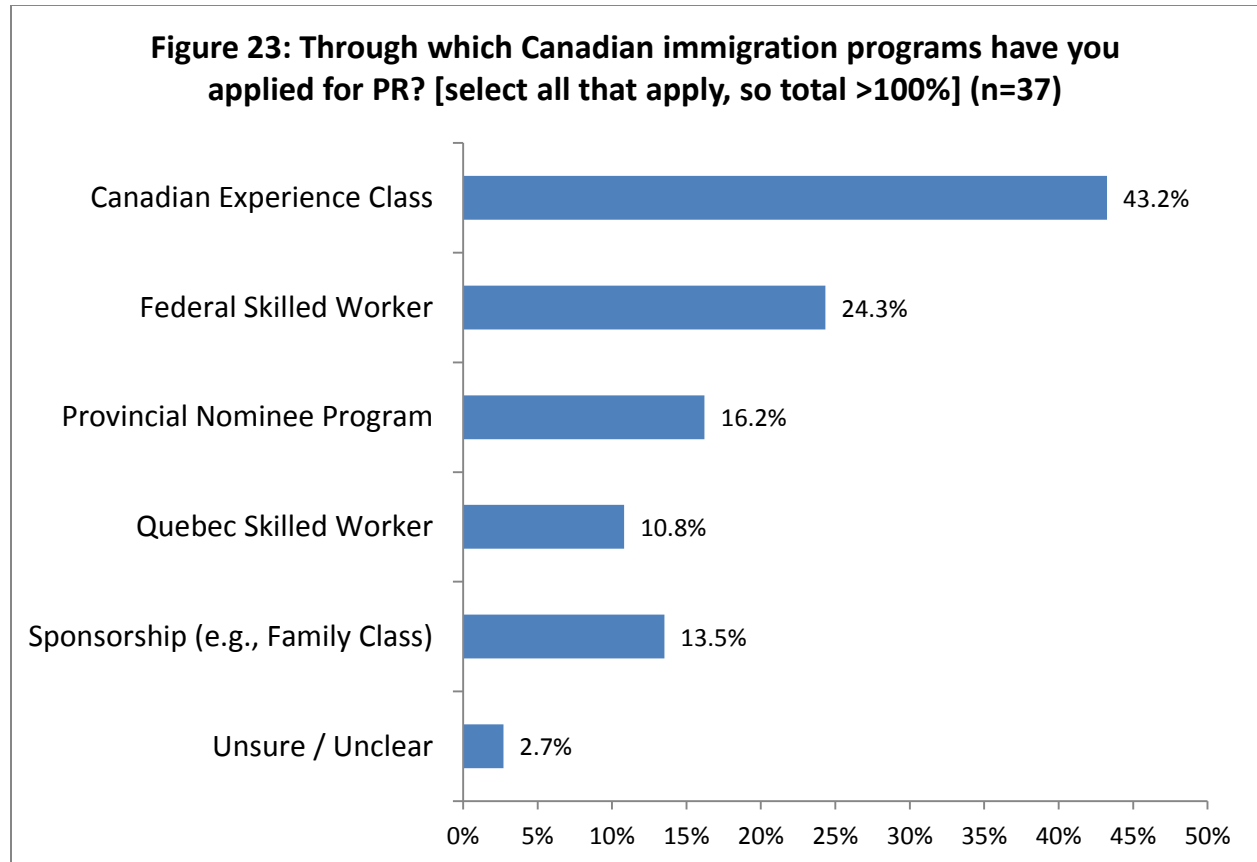


Figure 25a: With respect to the policies and procedures related to PR for international postdocs in Canada, how would you rate the following? (n=37)

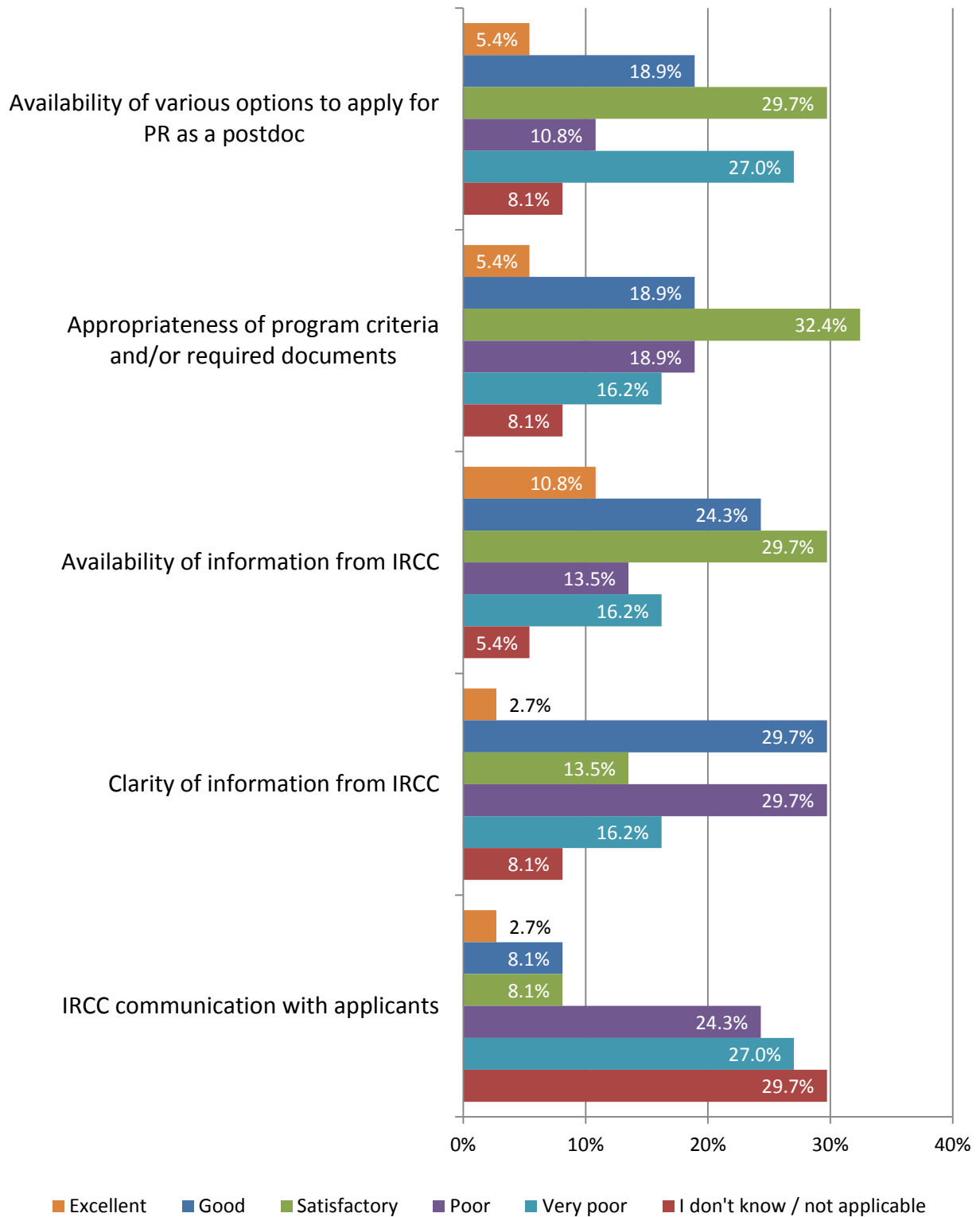
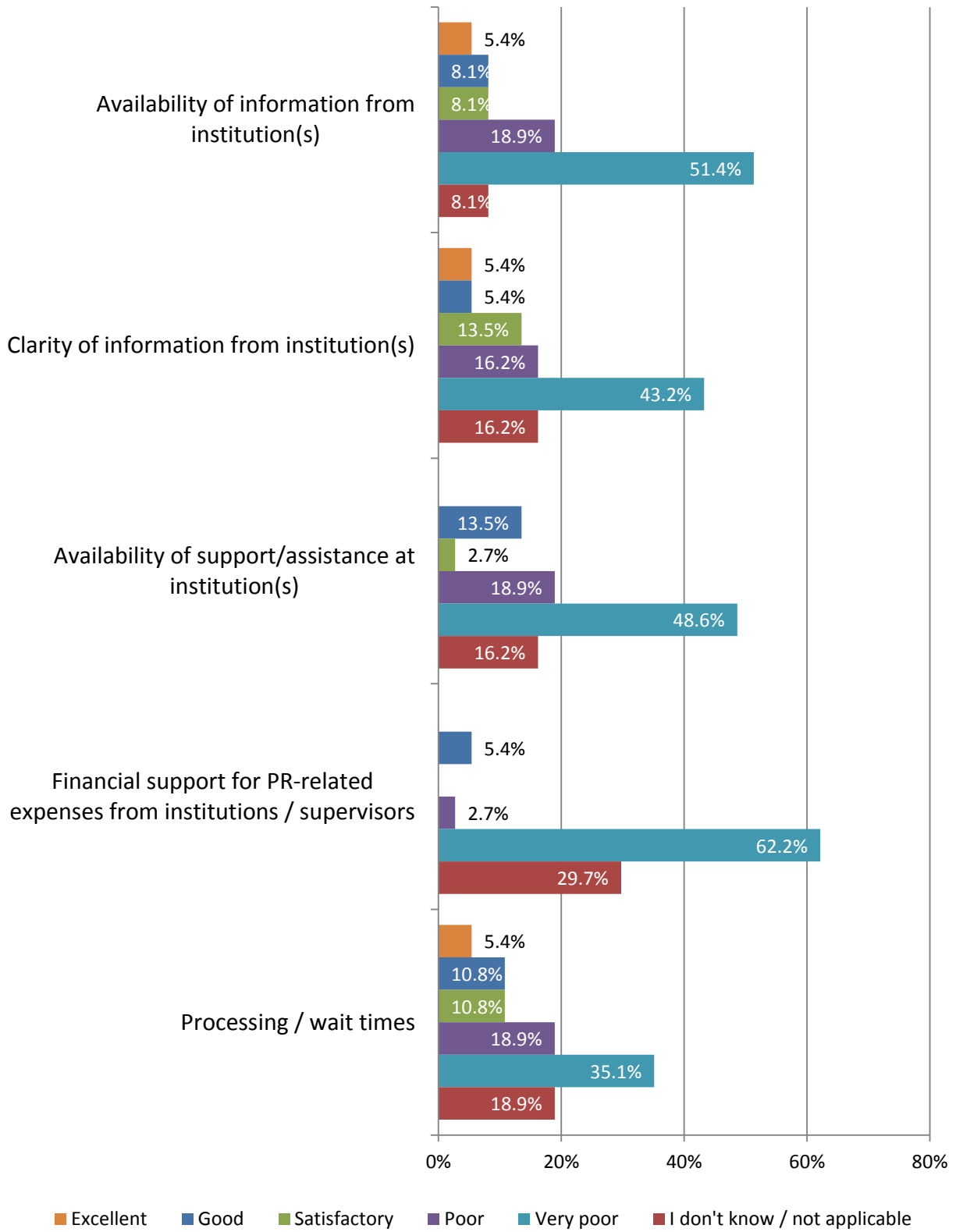
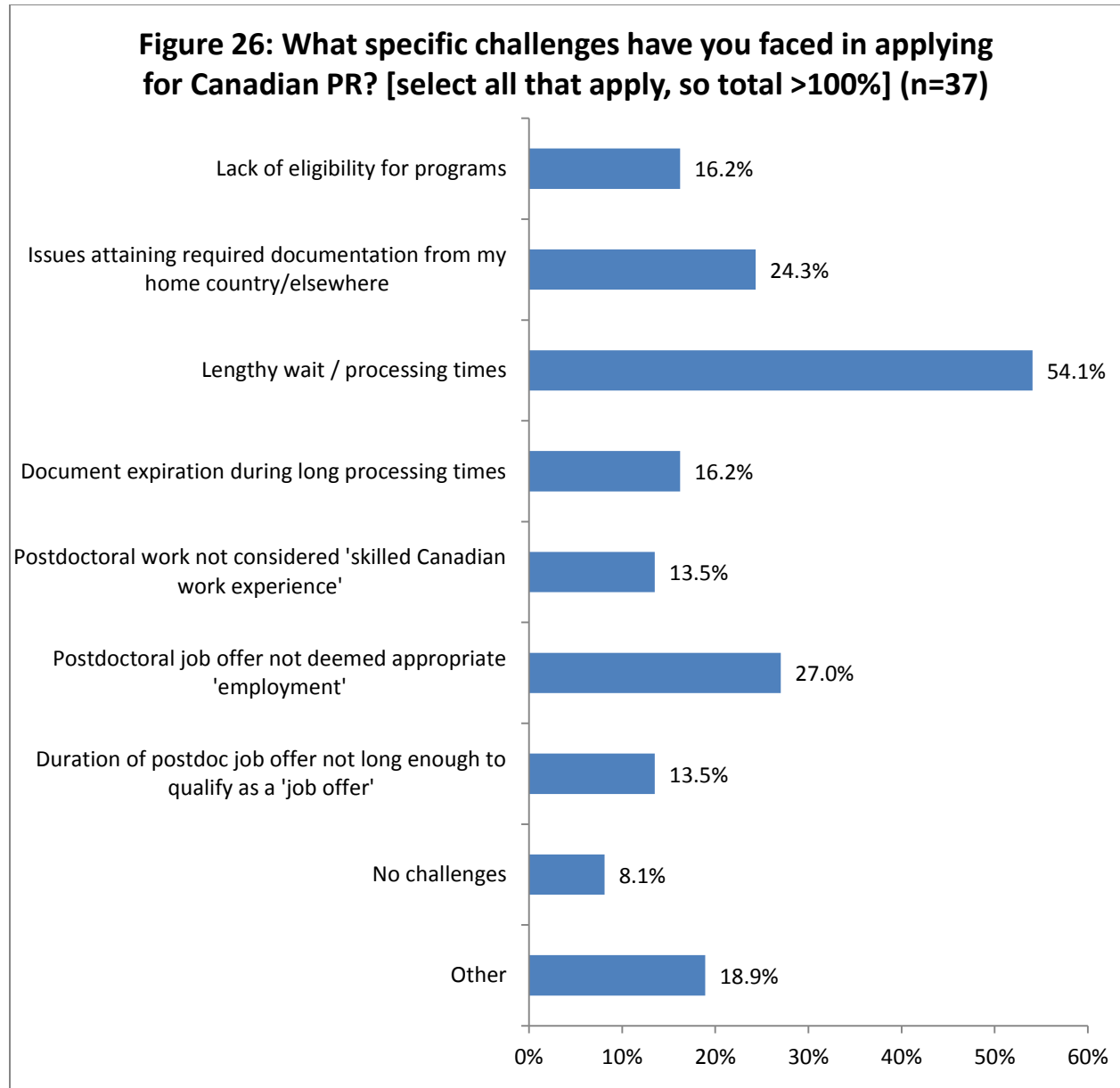
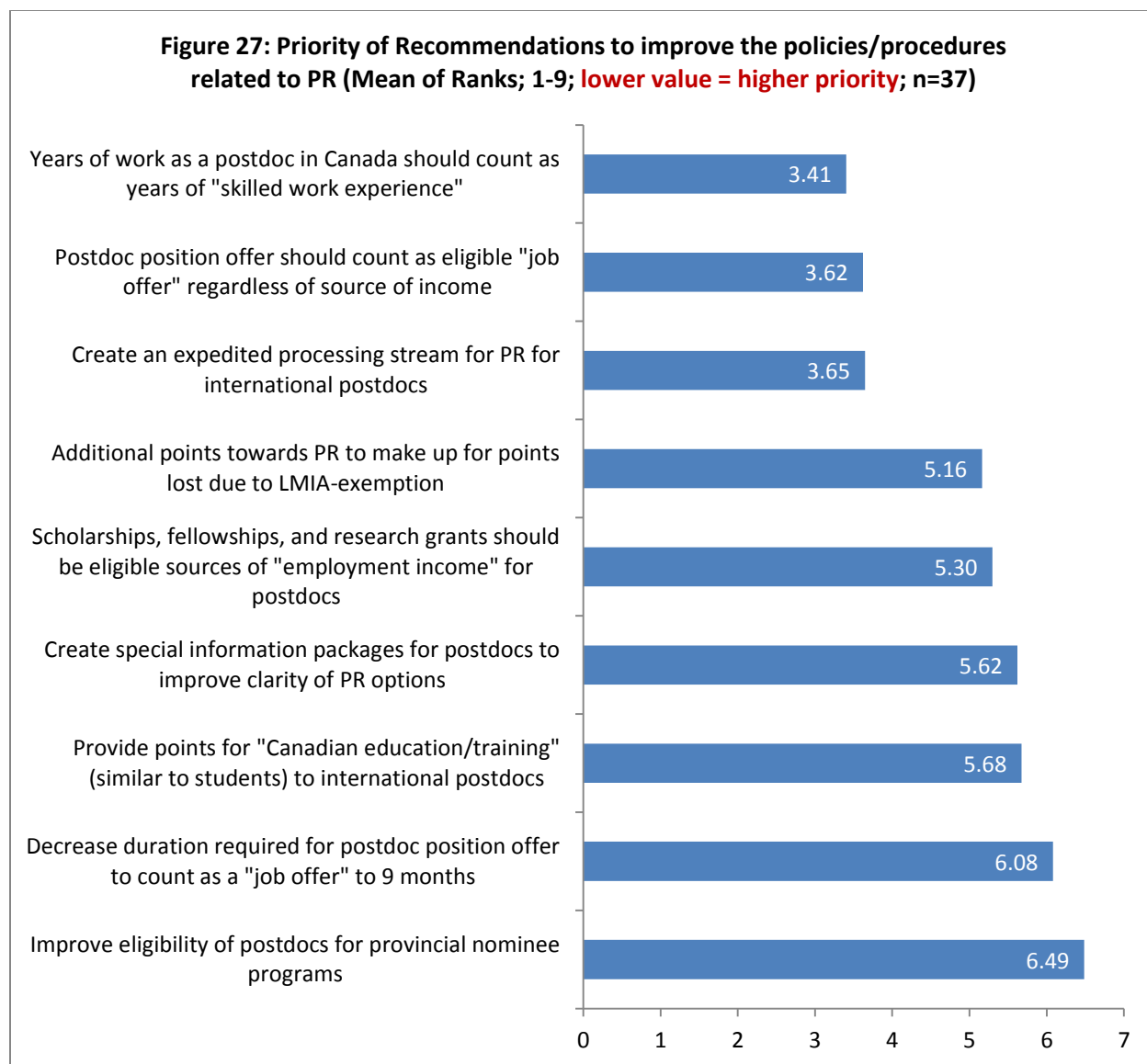


Figure 25b: With respect to the policies and procedures related to PR for international postdocs in Canada, how would you rate the following? (n=37)







Do you have any additional recommendations that you believe should be a high priority for the IRCC to improve the policies or procedures related to postdoctoral PR applications? [optional]

"I think postdocs who have been studied their PhD in Canada should have a higher priority, as they have already lived long enough in Canada and are more [likely] to stay after getting their PR."

"IRCC call center has very long wait times, too often the call is dropped because all representatives are busy. On two occasions, I was able to find out that a document was necessary to complete my application through calling. Only a couple of days later did the information online about my application update."

"Provide clarity of NOC codes for postdocs. This is my main concern for my application, I felt that either choice I would make could be 'wrong' and therefore I am concerned about my application."

How much money in total do you estimate that you have spent seeking PR (in CAD\$)? [optional]

| | |
|---------|----------|
| Mean | \$3,675 |
| Median | \$2,750 |
| Minimum | \$0 |
| Maximum | \$15,000 |
| n | 20 |

How many months in total do you estimate that you have spent pursuing Canadian PR? [optional]

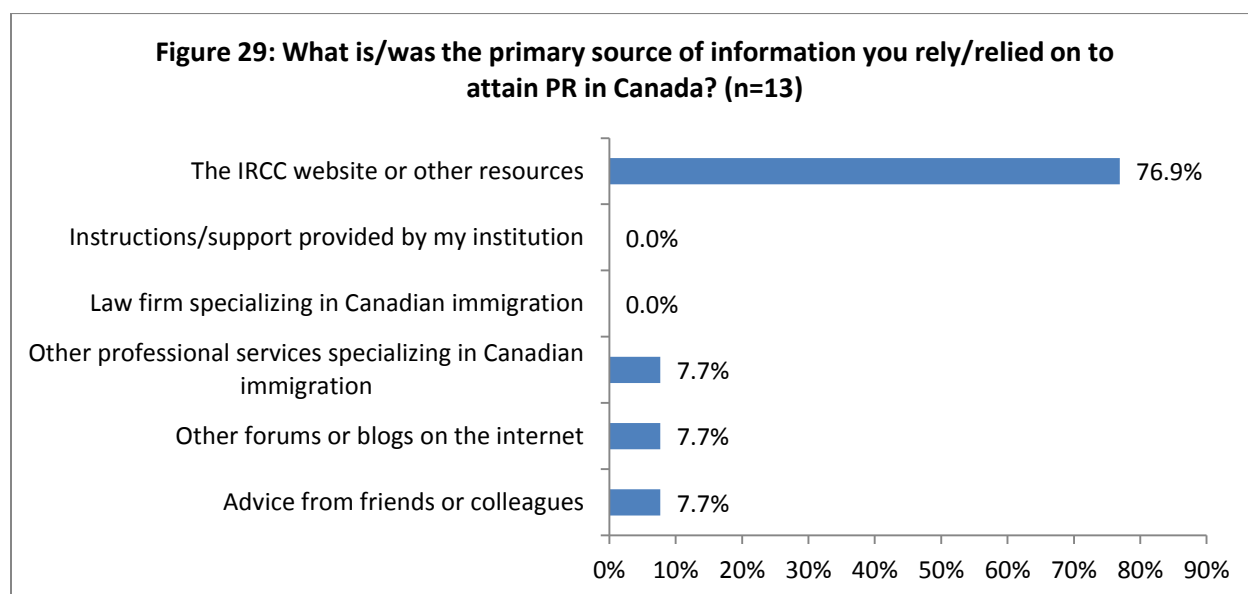
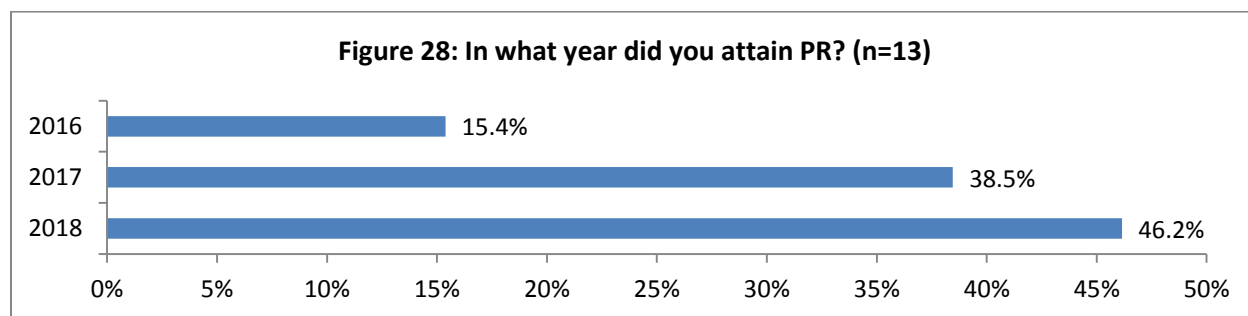
| | |
|---------|-----------|
| Mean | 15 months |
| Median | 13 months |
| Minimum | 3 months |
| Maximum | 60 months |
| n | 20 |

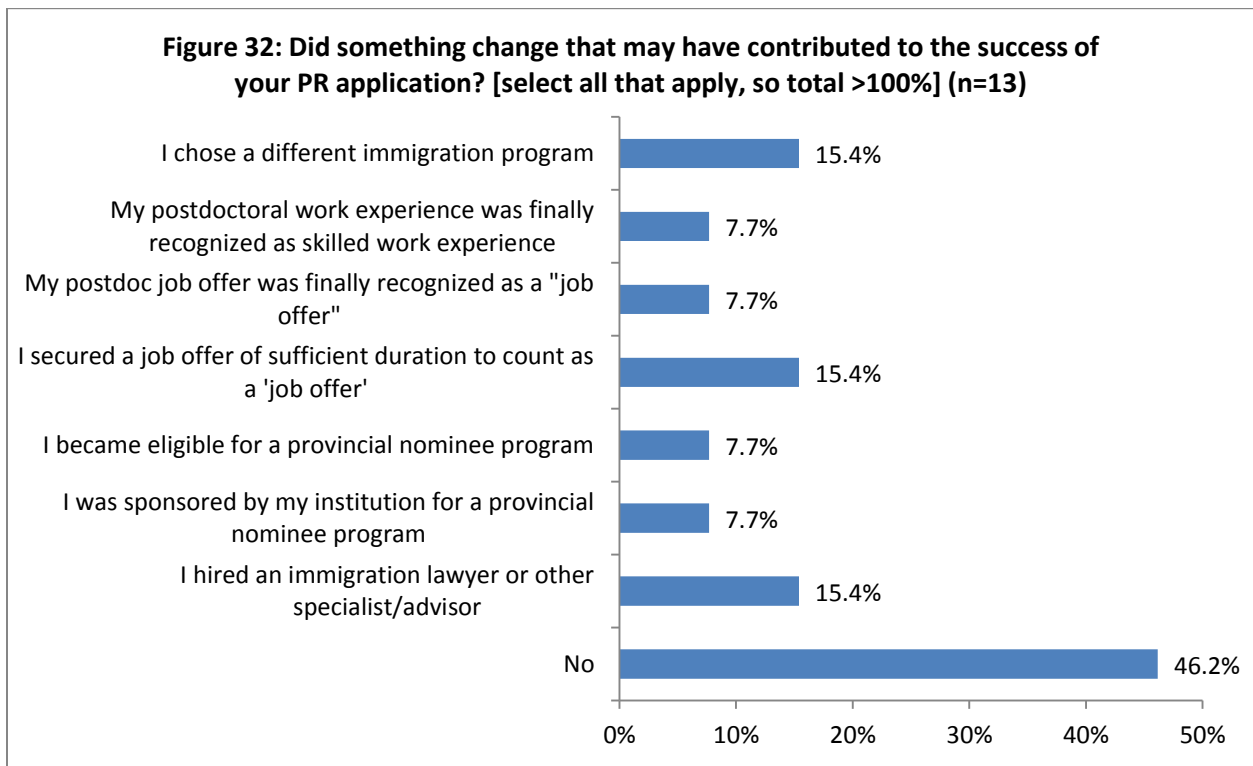
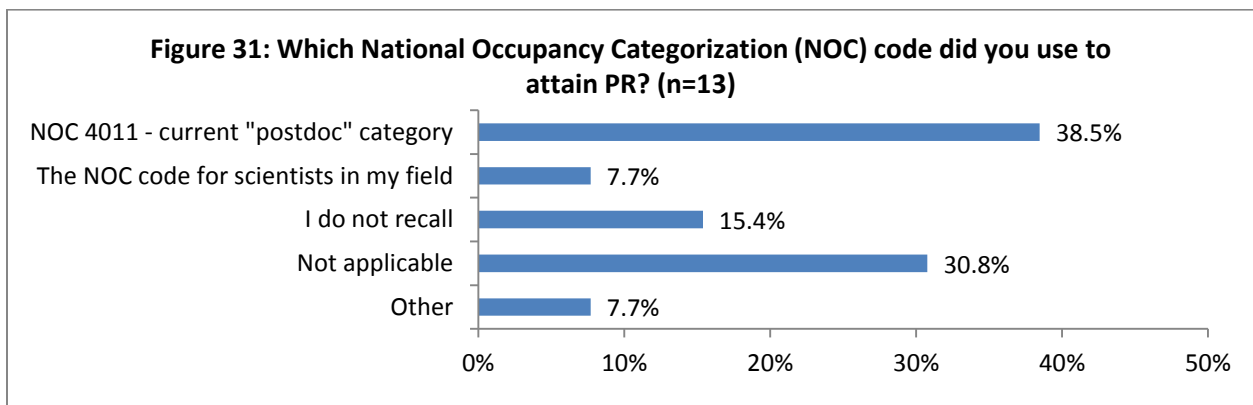
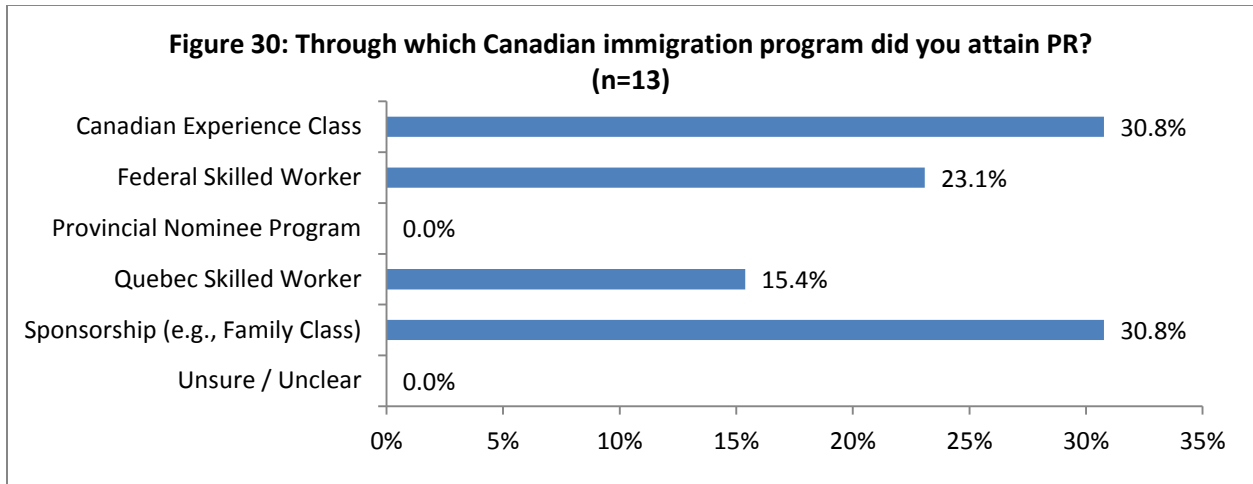
5 – PERMANENT RESIDENCE ATTAINED

32.4% (12 people) attained PR in the last 3 years

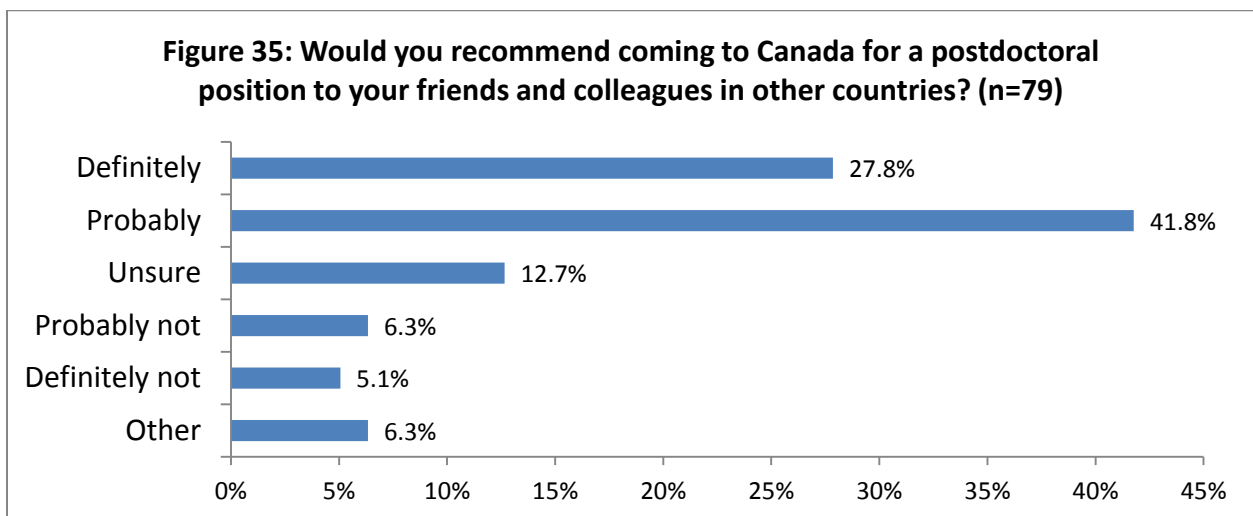
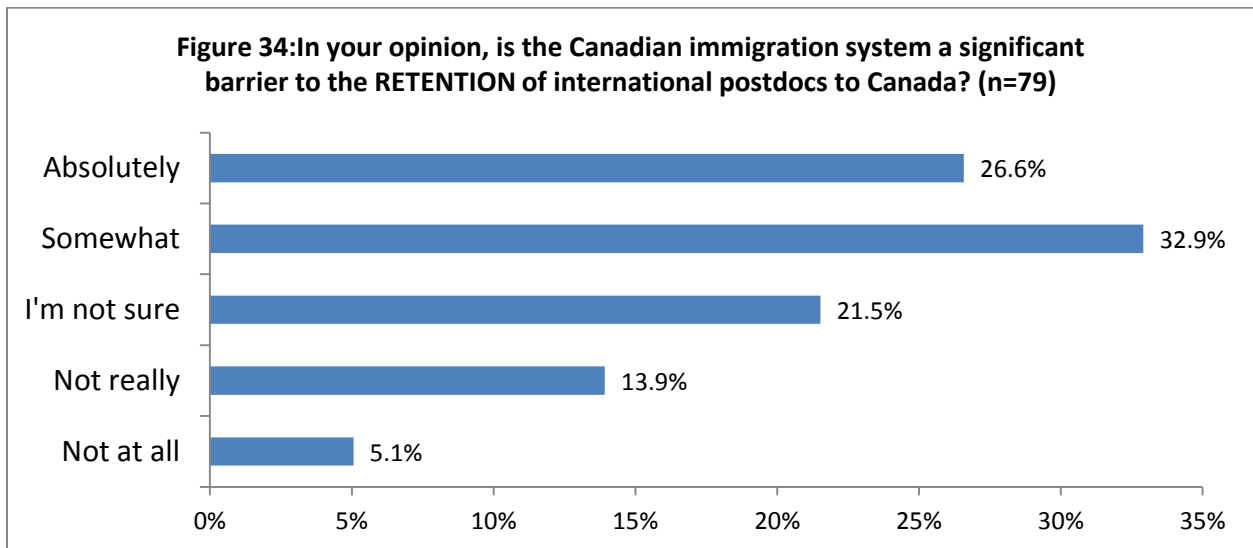
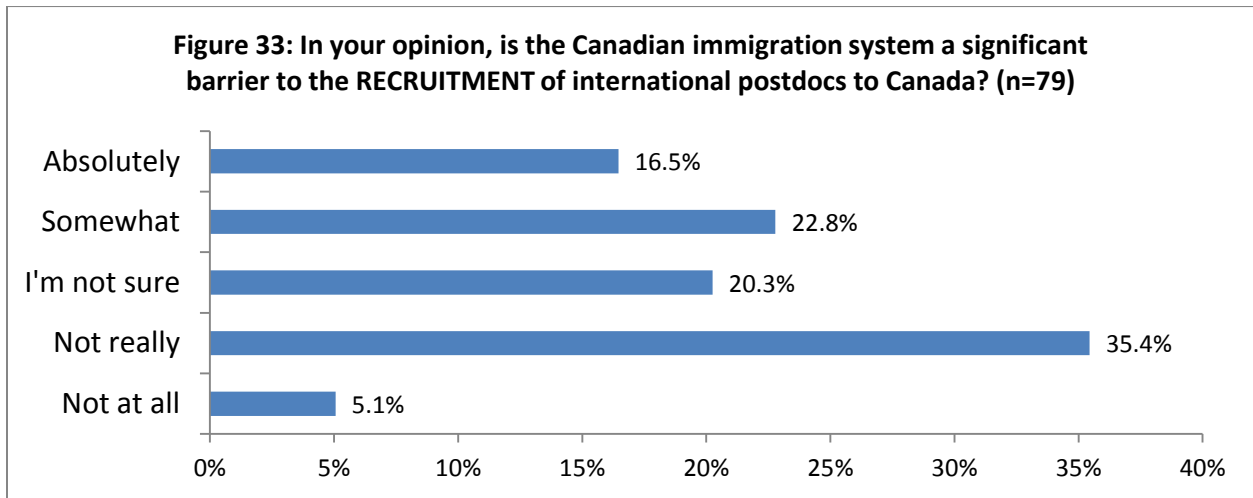
2.7% (1 person) was in the process of accepting an invitation to apply at the time of the survey

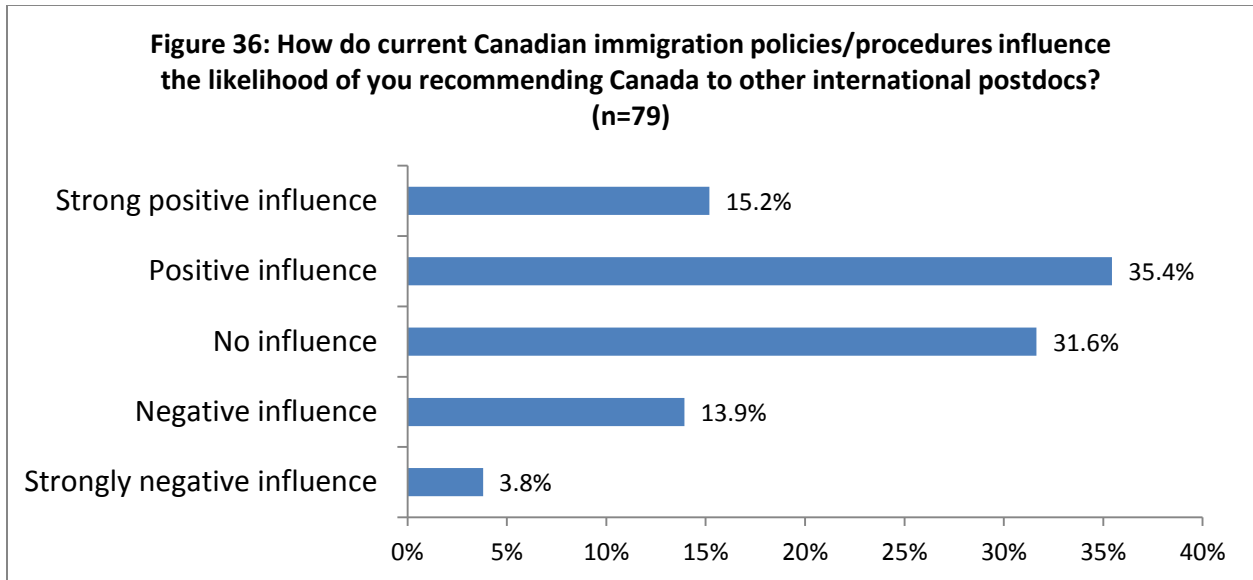
64.9% (24 people) have not yet attained PR





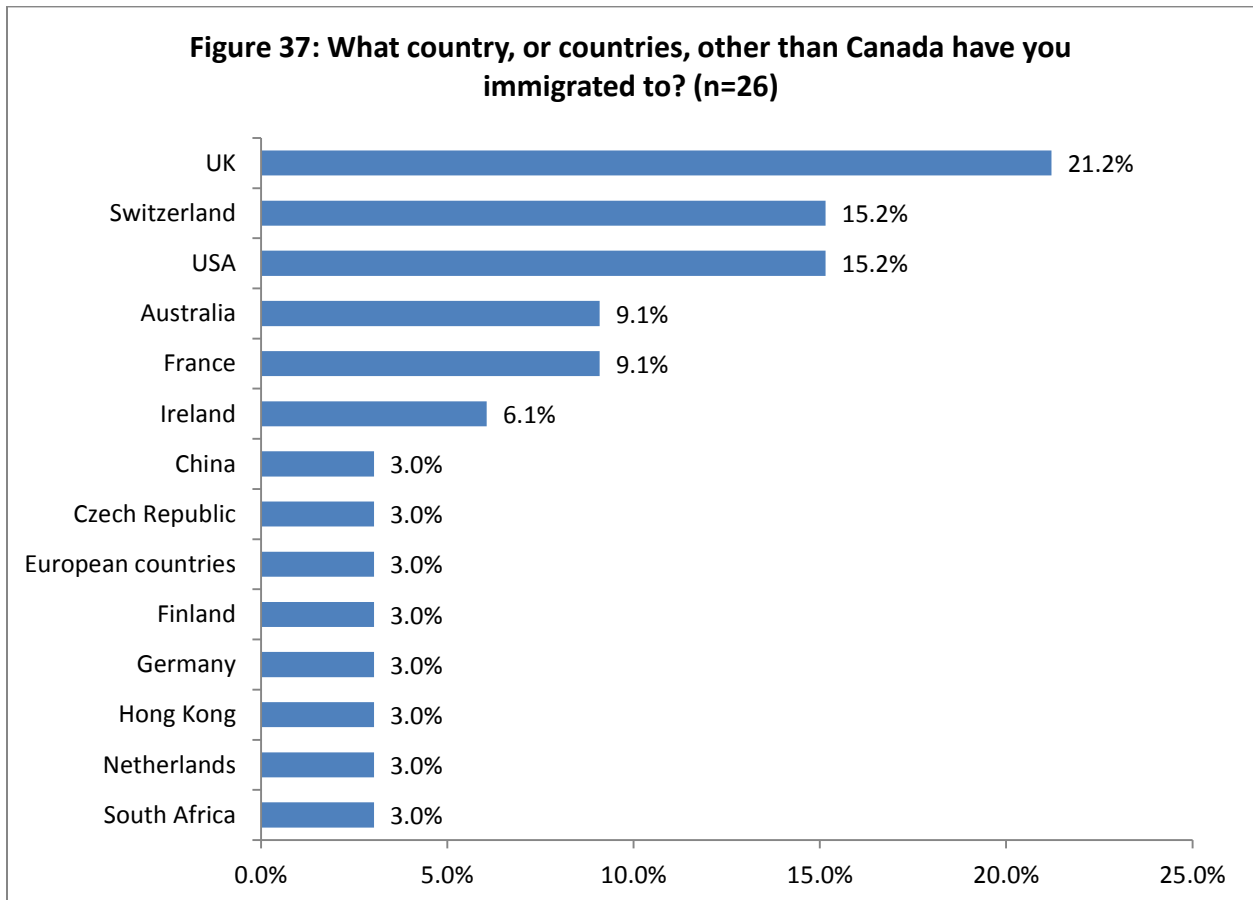
6 – INTERNATIONAL PERCEPTIONS OF CANADIAN IMMIGRATION

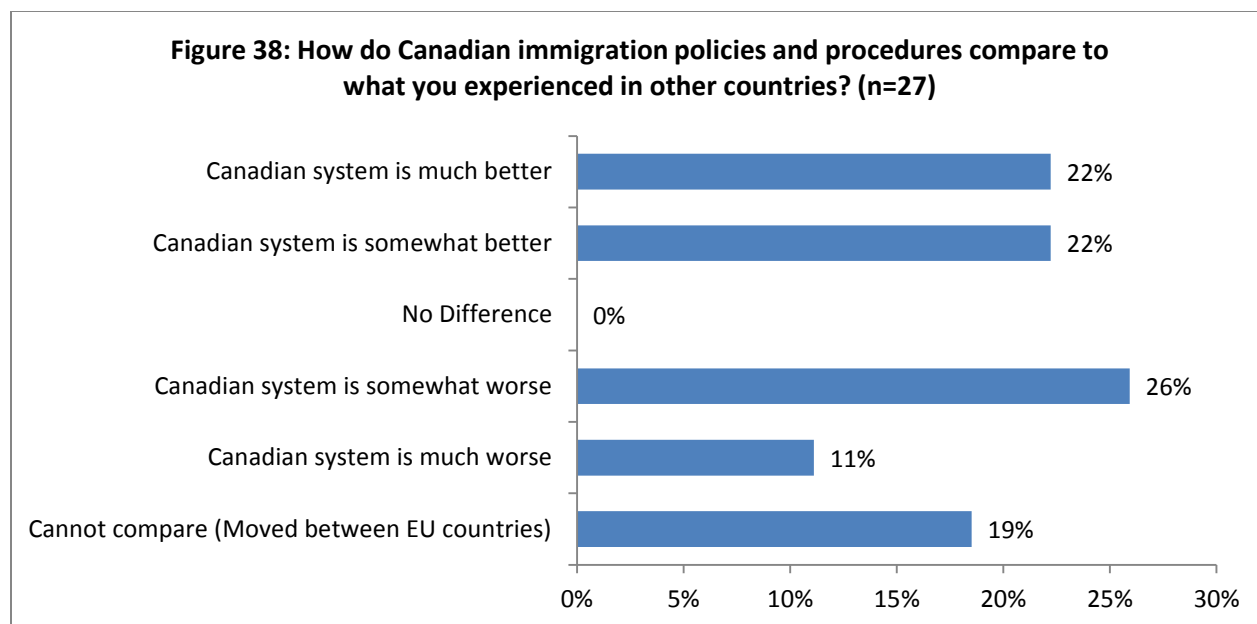




7 – OTHER IMMIGRATION EXPERIENCE

34.2% of respondents (27 people) had experience immigrating to other countries.





Please describe any approaches/procedures used in other countries that you believe would be advantageous for the IRCC to adopt in order to facilitate recruitment/retention of international postdocs in Canada. [optional]

“England allowed me to apply for an open work permit so that I could change jobs easily if it didn't work out. I think this is a much better approach and gives postdocs more flexibility to explore different career options.”

“China makes the complete decision up front and grants a permit remotely before you enter, complete with dates and provisions. Ireland required 1/10th the amount of information for applicants -- more burden on employers....”

“Facilitate the transition from academia to non-academic jobs from an immigration point of view. Compared with the US it was much easier. However, compared with studying within the European Union, it was much worse.”

“Please use Australia as an example, it will be so much better if Canada [had a single point of contact]... and have an immigration office where we can assess.”

“Postdoc employment should be counted as proper employment, not as training since postdocs are required in order to attain tenure track jobs; recruiting international talent through postdocs can be a good way to increase the number of highly skilled academics in Canada”

“Simplify required documents for work permit application (especially proof of previous employment)”

“South Africa gives Critical skills visa and eventual PR to the foreigners who got their PhD in South African Universities. The same also applies to international postdocs.”

“Swiss permit C regulation is simpler and more effective than the Canadian PR”

8 –FINAL COMMENTS & SUGGESTIONS REGARDING CANADIAN IMMIGRATION

“...consider establishing a more direct contact with the applicants at the time they prepare to apply as it takes a lot of time an effort to become familiar with all the details required for successful application and some answers found on the website are simply inadequate/ambiguous and therefore insufficient in a specific situation one can find itself in.”

“I had no one to help me navigate the immigration process.”

“... Host Institute/University should provide help to postdocs in Visa and immigration related matters”

“Iranians are facing prolonged delay in their applications... 100s of Iranian’s applications are stuck in the security check and our lives are on hold. As a postdoc who has obtained a PhD in Canada, I would suggest to expedite the process.”

“My biggest problem with immigration is the yearly renewal of work permits. My supervisor only started writing 2-year contracts recently, so newer post-docs don't have to do yearly renewal. If IRCC would give 3 year work permits, valid only for the position described, but regardless of length of contract, then they would significantly reduce their own work load and renewal wait times, while improving postdoc quality of life.”

“Set up some way to talk in person to an immigration officer”

“The main problem for me was the high detail of supporting documentation required, and the fact that the descriptions of these were conflicting throughout the website. Processing time was longer than the website said too.”

“While I have accepted that Quebec wants to select its own immigrants (the requirement for a certificat de selection de Quebec), I cannot for the life of me understand why the federal processing must then take 17 months instead of 6 as for all other provinces! We have been pre-screened - so it must take 3 times as long?”

“In order to hold a work permit, I need to continue working as a postdoc instead of as a real employee with benefits, and not having PR status excludes me from applying from almost any Canadian research funding. The situation is crippling not to say depressing and I'm sure that many talented but less stubborn postdocs have given up when faced with these challenges. I would do my job much better if I didn't have to constantly worry about work permit, health insurance expiration due to work permit, eligibility for drivers licence, etc.!”

“That it is so difficult for a highly educated person to live permanently in Canada is a complete mystery to me. My country paid for my education and here I am, a fully trained expert in my field that Canada gets without having to spend resources. Yet I have to spend thousands of dollars on language tests and medical exams that expire before the documents go through processing and thus have to be done again.”

TEMPORARY WORK AUTHORIZATION (WORK PERMIT) RECOMMENDATIONS

- 1) Make postdoc work permits closed with respect to job title, but open with respect to ‘employer’ and make the duration of all initial postdoctoral work permit 3 years (the average length of a postdoc in Canada).**

This single recommendation would do wonders for addressing a number of issues facing international postdocs on work permits in Canada, and would thus enhance the recruitment and retention of foreign talent. In particular, this recommendation would:

- Enhance the mobility of international postdocs within Canada and enable them to find another suitable postdoc position should conflict arise with a supervisor (it is difficult to find another suitable supervisor in the same field at the same institution) or institutional administrators.
- Eliminate the need to abandon a current work permit and apply for a new one when a postdoc changes supervisors/institutions, which will save time, effort, and money for the postdoc, and time and effort for IRCC employees.
- Provide more options (and possibly time?) for international postdocs to find suitable employment if their current position is terminated prematurely by either party.
- Reduce the time and effort currently required for work permit renewals, which are typically done on an annual basis, for both the applicant and agents of IRCC.
- Provide some semblance of job security and protection for the highly vulnerable international postdoc population.

- 2) Spouses / partners of postdocs on work permits should be “guaranteed” an open work permit of equal duration regardless of which work permit program they apply through.**

- While this is rarely a problem for postdocs in Canada, CAPS/ACSP continues to receive the occasional complaint about this issue, including more than one on our 2018 Immigration Survey and our 2016 National Survey.
- We wonder if there are differences between the IMP and TFW programs that contribute to problems for spouses/partners of postdocs who apply through one stream or the other, and we recommend that the IRCC examine current policies to ensure such issues are made clear to international postdocs and the institutions that employ them.

- 3) Canadian institutions should be better informed and equipped to provide support for international postdocs applying for work permits.**

- Mistakes at the institutional level were mentioned repeatedly as a cause of delays in attaining work permits (up to 5 months at a time), which costs international postdocs dearly given that they (and their spouses/partners) are unable to earn a living during those delays.
- The information and support available to international postdocs regarding work permit policies and applications vary significantly from institution to institution in Canada. This may be due in part to a lack of administrative support in general, particularly at smaller institutions with fewer postdocs. Regardless of the cause, this situation is detrimental to the recruitment and retention.

4) Provide a single point of contact for each applicant – preferably an IRCC agent who is specially trained to handle postdoctoral inquiries.

- A single point of contact approach is used in some other countries (e.g., Australia) and provides a means to get questions addressed quickly and correctly (assuming the point of contact is trained to handle postdoctoral inquiries). This approach also provides continuity in the handling of each specific case, which is highly beneficial with respect to the clarity of information and the expectations from the perspective of applicants.
- Postdoctoral immigration is complicated due to the vague and often unclear status of postdocs as trainees/employees. IRCC agents specially trained to handle postdoc immigration inquiries would prevent the IRCC from misinforming postdocs. At present this is an issue, as IRCC agents sometimes lack knowledge regarding the complexities of postdoctoral immigration. For example, a current post on the IRCC Help Centre website includes [an inquiry from a postdoc regarding PR](#), where the agent who responded to the inquiry assumes that the postdoc is on a study permit rather than a work permit. This is never the case for postdocs, so the response is far more confusing than it is helpful.

Alternative Suggestions

- 1) If recommendation #1 is not adopted, then the following recommendations should be implemented to enhance recruitment and retention of international postdocs in Canada:
 - a. Simplify, streamline, and speed up the renewal process for postdoctoral work permits.
 - b. In the case of early termination of contracts by the ‘employer’ postdocs should be eligible for at least 2 months of job-loss benefits if they have been contributing to employment insurance. This would provide a more reasonable timeframe for finding a suitable replacement position in Canada.
 - c. In lieu of lengthening the duration of initial work permits to 3 years, allowing work permit extensions based on extensions to the original postdoc contract or new contracts could significantly reduce processing times by eliminating time-consuming renewals.
- 2) If the government truly wishes to retain more highly educated and skilled immigrants outside of academia, then the IRCC should provide open work permits of a set duration (e.g., 3 years) to international postdocs. According to the open-ended comments on immigration in other countries, this approach is used in England, so there is precedence for it in competing nations.

Requesting Clarification from IRCC Regarding the Practice of Canadian Institutions Sponsoring Work Permits for “Non-Employees”

A final point related to work permit applications by international postdocs comes from a report by Clark (2017), who noted that international postdocs are typically advised to name the institution where they will be working/training as the business where they will be “employed” during their time in Canada. Given that existing internal policies at many Canadian institutions clearly state that postdocs (or at least some postdocs) are “not employees”, Clark questioned whether this amounted to institutions making misrepresentations to the IRCC as well as counselling misrepresentation by international postdocs.

CAPS/ACSP requests that the IRCC clarify their stance on this practice, to ensure that international postdocs are protected from any charges related to misrepresentation.

LONG-TERM IMMIGRATION (PERMANENT RESIDENCE) RECOMMENDATIONS

1) Revise the Comprehensive Ranking System (CRS) matrix for EE to include years of experience as a postdoc in Canada as years of experience as a “skilled worker” in Canada regardless of the source of income of applicants.

- The EE system requires that the applicant receive a job offer through a Labour Market Impact Assessment (LMIA) or several years of experience as a skilled worker in order to receive an Invitation to Apply (ITA) for PR. However, postdocs are exempt from LMIA's (under Regulation 205(c)(i), C44 of the Immigration Manual) and their years of experience engaged in research and scholarship in Canada are generally not counted as “skilled work experience” under existing PR programs because postdoctoral salaries typically come from scholarships / fellowships and research grants; none of which are recognized as sources of “employment income”.
- To rectify this situation, scholarships, fellowships, and research grants should be recognized as eligible sources of “employment income” for all postdoc PR applications so that postdoctoral work is considered “skilled Canadian work experience”.
- In the 2010 Budget, the federal government made it quite clear that they consider postdocs ‘workers’, not students, when they clarified that postdocs were ineligible for the federal scholarship tax exemption. Since that time, and unlike students, all postdocs have paid full federal income tax on their income regardless of whether they are paid a salary or a stipend from an external funding award. This situation is unfair, as it basically allows the federal government to treat postdocs as employees for the purposes of taxing them, but as non-employees for the purposes of PR. This inconsistency should be addressed.

2) Allow offers of employment as a postdoctoral scholar in Canada to count as eligible “job offers” for PR regardless of the source of income (salary or stipend), provided they are at least 9 months in duration.

- This recommendation addresses the reality of postdoctoral appointments in Canada today, as postdoc contracts are never permanent because the position is temporary in nature, with a common maximum duration of 5 years and an average of 3 years. Thus, it is impossible for a postdoc to have a permanent position or job offer as a postdoc and requiring as much is tantamount to not offering that route to PR to any postdocs in Canada.
- Given that institutions tend to prefer doing one year contracts with their postdocs these days, we suggest going the extra step of reducing the duration of job offers that are eligible for PR to 9 months. This is in large part to help ensure that international postdocs have at least a 3 month window in which to focus on their PR application before they need to begin working on their next work permit.

3) Create an expedited stream for PR applications for international postdocs

- This recommendation acknowledges the fact that postdocs are typically limited to one year contracts or work permits at the institutional level, even when they have job offers for longer periods. If that situation is not rectified, then postdoctoral PR applications should be expedited to allow people to spend less time working on (and worrying about) their PR applications, so that they can focus on the research and other scholarly activities.

4) Improve communication with postdocs applying for PR

- This recommendation reflects the fact that the situation for postdocs applying for PR is complex and that their questions often fall outside of the information available online or via IRCC's regularly trained help center agents.
- This recommendation may be accomplished by:
 - a. providing access to a dedicated IRCC advisor who specializes in postdoc immigration;
 - b. the creation of special information packages for postdocs (posted online);
 - c. a dedicated email address for postdoc-related PR questions; and/or
 - d. a single point of contact for each individual international postdoc applying for PR.

5) Provide points for "Canadian education/training" for international postdocs

- These points should be similar (but not necessarily equivalent) to education points attained by international students who enroll in undergraduate and graduate programs.
- This policy change would acknowledge that postdocs are trainees, working under the mentorship of a top Canadian researcher. At present, we completely ignore this fact with respect to postdoctoral PR, and that should be rectified despite the fact that postdocs do not pay tuition.

6) Revise and/or clarify the National Occupational Classification (NOC) codes for postdocs

- NOC 4011 (University Professors and Lecturers) lists 'Postdoctoral Fellow' as an exemplary title, but most of the described duties for this code are not applicable to postdocs. In contrast, the NOC codes for research scientists in various disciplines (e.g., NOC 2112 – Chemists) are a better match for the duties of a postdoc in the specified field even though 'Postdoctoral Fellow' is not generally included as an exemplary job title for those codes.
- This situation causes significant (and unnecessary) confusion among international postdocs and even immigration specialists, with respect to which code is more appropriate to use in postdoctoral PR applications.
- Postdocs should have their own NOC code that captures the duties of the average postdoc more accurately, or they should be instructed to use the codes for scientists in their field of expertise.

Alternative Suggestions

If recommendation #1 in this section is not adopted for any reason, then we recommend that the IRCC:

Revise the CRS to provide points equivalent to LMIA possession for postdocs on C44 LMIA-exempt work permits and replace the requirement for a permanent job offer for those points to count towards PR for international postdocs with an ongoing or future postdoc contract that is at least 9 months in duration.

- Postdocs should receive LMIA-equivalent points to alleviate the disadvantage they were put under by the implementation of the EE system and the duration of any 'job offers' required for eligibility for those points should be reduced to 9 months based on the argument provided above in Recommendation #2.

CLOSING STATEMENT

The Government of Canada’s commitment to attract and retain top academic talent to ensure our position as a global leader in education, research, and innovation would be well-served by addressing the needs of young researchers coming to Canada to take up postdoctoral positions.

In its current state, the Canadian immigration system limits the recruitment and retention of foreign research talent due to a variety of policies and procedures that make Canada a less attractive destination for international postdocs – and particularly those contemplating long-term immigration. This seems contrary to the goals of Canada’s immigration policy, as international postdocs are among the “best and brightest” workers that the world has to offer. We believe that these people are precisely the kind of well-educated, hardworking, and highly skilled personnel that our country should welcome with open arms, and the recommendations provided in this report reflect that view, as well as CAPS/ACSP’s commitment to improving the experiences of international postdocs in Canada.

At present our country is viewed as a sort of “safe haven” of reason and logic by intellectuals, academics, and scientists across the globe. Meanwhile, global perceptions of our largest competitor for research talent, the US, have become quite negative under the current administration; particularly with respect to immigration policies. Canada should capitalize on this state of affairs, as it provides a great opportunity to bolster the recruitment of top researchers and help drive Canadian research and innovation in the years to come.

On behalf of all international postdocs in Canada, we would be happy to discuss the recommendations made in this report, or work with the IRCC in other ways, to develop immigration policies that improve the recruitment and retention of this group of early career researchers.

Thank you for your time and consideration.

Sincerely,

The CAPS/ACSP Executive Council

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