



Canadian Centre to
End Human Trafficking

475-52 Church Street,
Toronto, Ontario M5C 2B5

1-833-993-7867
info@ccteht.ca

ccteht.ca

November 7, 2025

The Honourable Julie Dzerowicz, M.P.
Chair, Standing Committee on Citizenship and Immigration
House of Commons
Ottawa, ON K1A 0A6

Dear Ms. Dzerowicz:

Re: Bill C-12 – Strengthening Canada’s Immigration System and Borders Act

The Canadian Centre to End Human Trafficking (the Centre) remains deeply alarmed by both the content and process surrounding Bill C-12, *Strengthening Canada’s Immigration System and Borders Act*. The proposed legislation emerged from a consultation process that failed to meaningfully engage civil society, immigrants, survivors of human trafficking and others affected by these changes. Most notably, Bill C-12 proposes sweeping legislative changes that seriously weaken refugee rights and undermine Canada’s values of fair treatment for immigrants.

While the government is focused on enhancing security, this Bill will actually increase *insecurity* among the thousands of people who are living in precarious conditions. These individuals – which include international students, temporary foreign workers, and those living without status – are already at higher risk of human trafficking. Laws that restrict their rights and access to due process will only deepen this vulnerability.

Bill C-12 proposes to grant the Minister of Immigration, Refugees and Citizenship and other officials significant powers to suspend or revoke temporary visas and permits, with few opportunities to appeal. These non-transparent powers, which are susceptible to political considerations, could lead to unjust deportations, arbitrary decision-making, and an increasingly opaque system.

The Bill would also restrict access to in-country asylum claims, imposing a one-year rule and narrowing access to full Immigration and Refugee Board hearings. Such measures undermine Canada’s obligations under international human rights law. This will make it far harder for people without status to obtain safety and legal status, creating an environment where individuals will rely on informal or unsafe work to survive.

The Centre believes that Bill C-12 will compromise the progress Canada has made on combatting human trafficking. Our organization has identified significantly higher cases of labour trafficking over the past two years. A significant number of these cases concern international students, migrant workers, and people without status. These groups are particularly vulnerable because their precarious immigration situations increase their risk of exploitation by employers seeking to take advantage of their insecurity. Often, individuals in these circumstances are afraid to report their abuse due to fears of deportation. This legislation will exacerbate these challenges, making it difficult to identify victims and hold offenders accountable.

We recognize the need for strong enforcement tools against organized crime and trafficking networks, including improved financial crime oversight. However, these measures should be enacted as separate pieces of legislation that do not restrict migrant and refugee rights.

Canada cannot improve security by increasing vulnerability. In order to uphold human rights and ensure anti-trafficking efforts are rooted in safety, the Centre joins a growing number of organizations, including the Canadian Council for Refugees, in calling for the complete withdrawal of Bill C-12.

We thank the Committee for its consideration of this submission.

Sincerely,



Julia Drydyk
Executive Director
The Canadian Centre to End Human Trafficking