



The Honourable Chris Alexander, P.C., M.P.  
Citizenship and Immigration Canada  
365 Laurier Avenue West  
Ottawa, Ontario  
K1A 1L1

November 28<sup>th</sup>, 2014

Dear Minister Alexander,

The Institute for International Women's Rights – Manitoba (IIWR-Manitoba) would like to express our concern regarding the current Canadian Immigration and Refugee legislation and policies, particularly as they affect women and their families. There appears to be a general trend toward reducing supports, creating barriers, and generally making it more difficult for refugees and immigrants to make Canada their home. This trend in reforms to Canadian immigration and refugee policies is cause for concern to all immigrants, but especially women and girls.

Canada's gender guidelines for refugee claims, released in 1993, were groundbreaking in recognizing both the persecution of women and the need to protect them. However, recent legislative changes to Canadian immigration and refugee policies are affecting women immigrants in a very negative manner. For example, we would urge the Canadian government to consider the implications of policy on the lives of the many women and children caught in conflict situations, as it has done in the past.

In regard to the recent Interim Federal Health Care Cuts, we understand the Federal government has reinstated health care services to some categories of refugees in response to a federal court order. We urge the government to make this decision a permanent one and increase the eligibility criteria so that all refugees, including refugee claimants, will benefit. We note particularly how important it is for pregnant women and new mothers to have access to a wide range of health care services, for them and their children.

**Additionally, there are several specific concerns that we would like to bring to your attention, including:**

- Alarming disparity between recent immigrants and Canadian-born workers increased during the last 2 decades. Recent immigrant women earned only 56 cents for each dollar earned by Canadian-born women.\*
- Moratorium on sponsorship of parents and grandparents. These relations often play a role in assisting with childcare and other family activities. Thus, the moratorium negatively affects labour market participation for immigrant women, as they may not be able to find or afford childcare opportunities elsewhere.\*
- Live-in caregivers – the requirement that these workers live in their employer's homes may increase the vulnerability of these individuals, who are often women, to abuse and exploitation, as it keeps these women isolated and hidden from the outside world.\*
- Changes made to refugee health care under the Interim Federal Health Program leaves many immigrants and refugees, especially pregnant women, or women with small children, without access to or coverage for medical care. Other refugees have significantly decreased access and receive less coverage. Although this has been temporarily changed, by court order, the assurance that this will be made permanent, must be

Institute for International Women's Rights – Manitoba  
PO Box 273, 971 Corydon Ave.,  
Winnipeg, MB., R3M 0Y0  
e-mail: [iiwr.manitoba@gmail.com](mailto:iiwr.manitoba@gmail.com)

given. Furthermore, there are a number of other refugees, including women and girls, who will not be covered for drugs or supplemental health benefits, even under these temporary measures, such as privately sponsored refugees.\*

- The October 2012 amendment to the *Immigration and Refugee Protection Act* was designed to deter immigration fraud. Many at the time feared that these changes could compromise the safety of immigrant women. The amendment, termed conditional permanent residency, requires that sponsored spouses must cohabit in a legitimate relationship for two years before obtaining permanent residency. A caveat does provide assurance that in cases of proven abuse or neglect the victim would not be deported. While data has yet to be collated, staff and child protection services report a spike in new cases since the amendments took effect. Women at risk are referred by the police and shelter staff to obtain help from social service agencies. But the onus is on the victim to prove her case. Those brave enough to say no to abuse must gather the strength to navigate a complex and sometimes hostile legal landscape to present their case and avoid deportation. Civil society leaders contend that this law, while neither overtly misogynistic nor racist, has the practical effect of re-victimizing the mostly female victims of spousal abuse. And because these probationary landed immigrants increasingly hail from nations in the grip of unrest where women's rights are unacknowledged, the result is discrimination. The evidence is depressingly familiar — women are most subject to violence in the refuge of their homes.
- The new Citizenship changes, which propose that immigrants must have a higher English language benchmark before they can apply for citizenship will marginalize newcomer women with young children who were unable to access EAL classes due to their family responsibilities. Long waiting lists for daycare spots is also a factor in preventing these women from accessing full time English programs, which could enable them to learn English more quickly.

\* Note - please see State of Immigrant and Refugee Women's Status in Canada – 2012 Joint Report; and Canadian Council for Refugees report: "Key Refugee and Immigration Issues for Women and Girls"; and "Domestic violence cases spike after immigration law amendment" by Ferrukh Faruqi

IIWR-Manitoba is an organization working to promote women's human rights, locally and globally. We would urge the Government of Canada to seriously address the concerns raised herein and conduct a gender-based analysis on current policies. A response to our letter would be most welcome.

Sincerely



Mary Scott & Nadia Kidwai Co chairs

iiwr.manitob@gmail.com  
PO Box 273, 971 Corydon Ave.  
Winnipeg, MB, R3M 0Y0

CC. Prime Minister Stephen Harper  
Hon. Kellie Leitch, Minister Status of Women  
Lysane Blanchette-Lamothe, MP, NDP Critic Citizenship and Immigration  
Hon. John MacCallum, MP, Liberal Critic Citizenship and Immigration  
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Institute for International Women's Rights – Manitoba  
PO Box 273, 971 Corydon Ave.,  
Winnipeg, MB., R3M 0Y0  
e-mail: iiwr.manitoba@gmail.com