

November 12, 2013

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

Dear Minister Alexander,

As you know, the business community is deeply concerned about the proposed changes to the rules governing intra-company transfers (ICTs) into Canada. We wrote to you on September 4, 2013 outlining those concerns in some detail. The current operation of the ICT category is efficient and provides business with predictability when transferring employees between international locations. In our view the changes to the ICT rules, as proposed by Citizenship and Immigration Canada (CIC), are unnecessary and ill conceived.

To gauge the extent of the impact of the proposed changes, CERC conducted a survey of our members that access the ICT program. I am pleased to share with you a report of our findings, a copy of which is enclosed. The results confirm our view that the changes will restrict critical skills from entering Canada and are detrimental to the Canadian economy and our ability to compete.

The majority of respondents ranked the importance of the ICT program as being “*very important*” to “*critical for business operations.*” Overwhelmingly, companies use the ICT program to transfer critical global leadership knowledge, both into Canada and to international destinations. The ICT program is a two way path that delivers enormous benefits to Canada’s economy; it drives innovation and creates good paying jobs.

Canadian employers must continue to compete at an international level for the brightest and the best of the global talent pool. We strongly recommend that the existing ICT rules remain intact.

Sincerely,



Stephen Cryne
President and CEO, Canadian Employee Relocation Council

Attachment:

c.c.: The Honourable Jason Kenney, P.C. M.P
Minister of Employment and Social Development and Minister for Multiculturalism