



Business Council of Alberta Submission on Proposed Express Entry and CRS Reforms

POTENTIAL PROGRAM CHANGES

Q1: What are your thoughts on the overall direction to simplify Canada's Federal High Skilled immigration programs and streamline eligibility requirements?

The Business Council of Alberta strongly supports efforts to reduce the number of programs and streamline eligibility requirements, consistent with our earlier work on [prosperity-driven immigration](#). Simplification will help refocus the system on the primary objective of economic immigration: selecting candidates most likely to make the greatest contribution to Canada's economy.

Q2: How effective do you think this approach would be in achieving the stated objectives around client experience and operational efficiencies?

Simplifying Express Entry streams and eligibility is an important step. However, we believe there is an opportunity for IRCC to build on this by expanding these efforts across all streams of economic immigration. Over time, Canada's system has become increasingly layered and complex, with overlapping streams that dilute the primary objective of economic immigration and make the system harder to navigate.

Ultimately, each stream should serve a distinct and complementary role. This would further streamline requirements for prospective immigrants, reduce administrative burden for IRCC, and provide a clearer signal about the skills and characteristics Canada values.

Beyond streamlining and simplification, we see additional opportunities to improve system efficiency and navigation for prospective immigrants:

- **Redesign IRCC's main informational webpage and related webpages** for permanent residency to be more newcomer-centric, with an emphasis on simplicity — easy to read, understand, and navigate.
- **Allow individuals to track their application status** directly within their primary applicant account and portal, eliminating the need to create a separate account.
- **Offer a paid option for expedited processing** (as is done in other countries) and utilize this revenue to further enhance the efficiency of the system that will benefit all newcomers.



Q3: What opportunities and challenges do you anticipate related to the possibility of merging the programs and streamlining requirements?

Most important will be clearly communicating any changes to prospective immigrants well in advance, and ensuring a smooth transition from the previous system to the new one. Applicants need certainty about which system applies and the criteria against which they will be assessed based on the date they submit their profile to Express Entry. Equally important will be meaningful engagement with provinces, which are directly affected by changes to Express Entry, as they often select candidates from the Express Entry pool and are important partners in the Canada-wide success of economic immigration.

POTENTIAL COMPREHENSIVE RANKING SYSTEM CHANGES

Q4: What are your thoughts on the overall direction to refocus the Comprehensive Ranking System on factors associated with positive economic outcomes?

We strongly support this direction as it aligns with the core objective of the Federal High Skilled Worker Program and what we see as the greatest economic opportunity of immigration: selecting candidates with the highest economic potential. We are also encouraged by the commitment to evaluate the Federal High Skilled programs and the Express Entry system over a longer time horizon, which will be important for building a better understanding of the link between immigrant characteristics and economic outcomes.

We encourage IRCC to regularly review the Comprehensive Ranking System to ensure Canada continues to prioritize the best candidates and that the points-based system remains a competitive advantage in attracting global talent.

Regular review alone, however, is insufficient. Canada should also commit to continuous improvement — proactively refining and strengthening the system based on results from individual evaluations. Canada should be a world leader in economic immigrant selection, and the CRS is a central part of that. To help guard against shifting political priorities, its criteria should focus on objectively quantifiable measures of economic potential.

Q5: How effective do you think the potential changes to the Comprehensive Ranking System would be in achieving the stated objectives around economic outcomes and selection of top talent?

The purpose of the CRS is to identify the candidates likely to contribute the most to Canada's economy. Adding highly predictive factors such as high earnings and



removing those with limited value, such as having a sibling in Canada, represents a clear improvement.

However, the effectiveness of the CRS depends on its weight within the broader immigration system. If its role is diluted by the expansion of other federal streams or heavy reliance on category-based selection, its impact will be limited. Beyond minimizing the number and complexity of economic immigration streams outside of the Federal Skilled Worker Program, category-based selection should be used sparingly and only where there is clear, evidence-based rationale (e.g., addressing acute and well-defined labour shortages).

Q6: What opportunities and challenges do you anticipate related to the possibility of refocusing the Comprehensive Ranking System on the best predictors of economic outcomes?

We generally support the proposed changes to the Comprehensive Ranking System but oppose the blanket removal of points for Canadian post-secondary credentials. Recent results show that candidates with a Canadian bachelor's degree outperform those without even if those with college credentials do not see the same performance advantage. Removing points for both indiscriminately throws away valuable information about a candidate's economic potential and the value of Canadian education.

It's also worth noting that the relationship between Canadian post-secondary credentials and immigrant outcomes is likely impacted by the tremendous surge in the international student population in recent years. The sheer volume of students, together with the fact that many were enrolled in diploma programs at lower-tier colleges, may be watering down an otherwise positive relationship.

Instead of removing points for Canadian post-secondary credentials, we recommend taking a more robust approach: awarding additional points based on the median economic outcomes of recent graduates from a given institution — college or university — regardless of credential type. This rewards candidates from high-performing institutions while eliminating the perverse incentive that has allowed low-quality institutions to grow enrollment and exploit the immigration system. This approach has the additional benefit of adjusting automatically as institutional quality and outcomes change over time, keeping the CRS better aligned with its stated purpose of selecting candidates most likely to succeed economically.

As well, we see an opportunity to further strengthen the points system and its role in economic immigration. Specifically, we recommend the following:

- **Close information gaps by making all Express Entry application fields mandatory.** Currently, some fields used to determine CRS scores are optional, which limits the data available for future research and improvement.



- **Establish an annual labour market forum** that brings together labour market experts and business leaders to build a shared understanding of how Canada's labour market and economic immigration needs are evolving. This forum would provide an opportunity for stakeholders to share research and insights that could inform the CRS and broader economic immigration strategy, including emerging labour market trends, the impact of immigration on specific sectors, and the role of economic immigration in driving innovation and productivity growth.
- **Set a minimum points threshold** for selection through the Federal High Skilled immigration program, above and beyond the existing minimum entry criteria of individual Express Entry streams. This threshold should be set to predict income above the Canadian median and to ensure that, if immigration targets increase, the focus remains on skills and potential rather than numbers. This would help to protect against some of the challenges seen in recent years.

Q7: Is there anything that we have not covered, that you would recommend?

In tandem with improvements to the federal immigration streams, we see an opportunity to strengthen the broader economic immigration system. We recommend the following:

- **Restore Provincial Nominee Program targets.** The PNP plays a [critical role](#) in promoting regional diversity, incorporating provincial perspectives, and maintaining provincial support for Canada's immigration system. Yet cuts to permanent immigration targets have largely come at the expense of the PNP. The federal government should restore the PNP target to its recent historical level of 40% of economic immigrants.
- **Condense or retire federal streams that overlap with the PNP.** The federal government has increasingly introduced economic immigration streams that [heavily overlap](#) with existing provincial streams, creating confusion and undermining the effectiveness of provincial programs. IRCC should focus its economic immigration stream on broad determinants of economic potential and allow the PNP to focus on local labour market needs and opportunities.
- **Enhance the Provincial Nominee Program to strengthen economic outcomes Canada-wide.** As recommended in the BCA's report [Watered Down: The Case for Strengthening the Provinces' Role in Immigration](#), there are many ways to enhance the PNP's effectiveness. We see the following as priority areas where the federal government can help deliver greater prosperity through the program:
 - Establish clearer economic objectives for the program.
 - Adjust provincial allocations to strengthen overall PNP performance.
 - Improve federal-provincial coordination.



- Improve program accessibility and navigation to expand the pool of qualified candidates.
- **Increase the role and transparency of economic immigration.** The economic stream should represent at least 50% of total immigration to Canada, based on principal applicants only. The current practice of counting spouses and dependents of economic immigrants as economic immigrants is misleading given a much smaller share of those admitted under the economic stream were actually selected for their skills and potential. Principal applicants should be reported separately to give Canadians a more accurate picture of how the system is performing.