

9 June 2010

Mr. David Tilson
M.P. Dufferin-Caledon
Chairman of the Standing Committee on Citizenship and Immigration
Parliament Hill Office
Room 711 Justice Building
House of Commons
Ottawa, ON
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Mr. Chairman,

Following the proposed amendments to Bill C-11 to transfer the pre-removal risk assessment (PRRA section) functions to the Immigration and Refugee Board but not employees, we respectfully wish to emphasize the following points:

PRRA officers are hired following a very rigorous selection process that requires experience in the analysis of cases in an administrative or quasi-judicial context, or decision-making experience in a complex regulatory environment.

Many current PRRA officers and assistants are pioneers of the PRRA program that was established with the Immigration and Refugee Protection Act (IRPA) in June 2002. We have consistently worked on the program and have developed it with integrity, rigour, and professionalism in accordance with the Act and Regulations voted by Parliament.

For many years, we have been rendering difficult decisions on a daily basis that have heavy consequences and that, unfortunately, are often not popular with certain non-governmental organisations. We accept these responsibilities, however we wish to underline that we act in accordance with IRPA and render reasonable, justified and carefully considered decisions.

Lawyers in the Department of Justice and Judges of the Federal Court of Canada, who are in a position to judge the quality of our work in an impartial manner, acknowledge our expertise in this field and the high quality of the decisions rendered. Our high success rate at the Federal Court indisputably testifies to our professionalism, as does the deference by the Judges, mentioned frequently in their decisions.

Therefore, we are quite surprised by the decision not to transfer us with the program functions to the IRB, or at the very least, to not consider us as participants in this change. We do not understand the reasons that have justified the decision after so many years of loyal service and good work at CIC.

We are also of the opinion that, in the eyes of the Canadian public, it will be difficult to justify spending public funds to hire, train, and develop competent PRRA officers when they are already available.

In fact, you have at your disposal a group of approximately one hundred professional and qualified employees in which you have invested for many years.

We have gained considerable experience with regards to assessing requests for protection in Canada, knowledge on the human rights situation in the world, as well as expertise in decision-making. We master the issues and the subtleties of the program that you are preparing to transfer, and perhaps enhance. If need be, should additional functions be added, we are willing and open to training and we have no doubt that we could excel because we already master the essence of the program.

Considering the above noted facts, we request that you do not exclude us from the transfer process because we have already demonstrated the extent of our abilities since the establishment of the PRRA program in 2002. We take pride in this work and wish to have the possibility of continuing to carry out our duties. We respectfully request that you reconsider this decision.

Sincerely,

PRRA Team, Quebec Region

Cc. Rt. Honourable Prime Minister, Stephen Harper
Honourable Minister of Immigration, Jason Kenney
Deputy Minister, Citizenship and Immigration Canada, Neil Yeates
Director General Quebec Region, Citizenship and Immigration Canada, Albert Deschamps
National President, CEIU, Jeannette Meunier-McKay
Director, Office of Conflict Resolution, Susan Leith