
**Brief and recommendations for consideration by the
Standing Senate Committee on Social Affairs, Science
and Technology re:**

**BILL S-235: AN ACT TO AMEND THE *CITIZENSHIP
ACT AND THE IMMIGRATION AND REFUGEE
PROTECTION ACT***

Submitted by *Our Children, Our System, Our Responsibility* (OCOSOR), a coalition of agencies and advocates serving immigrants, refugees and children, and allied organizations

January 25, 2024

Executive Summary

The *Our Children, Our System, Our Responsibility* (OCOSOR) coalition of agencies and advocates serving immigrants, refugees and children, and allied organizations¹ supports Bill S-235 and encourages the Senate to pass it with a number of key amendments to ensure that it operates as intended. Specifically we propose amendments be made in order to:

1. Shift the Bill S-235 provisions out of s. 3 and into s. 5 of the Citizenship Act, so that eligible persons become Canadian citizens by way of grant rather than as of right.
2. Include individuals who were in informal care arrangements.
3. Limit the exclusion of children returned to their parent to those who were returned before reaching 16 years of age.
4. Impose a cumulative 180-days-in-care requirement.
5. Grant the Minister discretion to waive requirements on humanitarian and compassionate grounds.
6. Stay the removal from Canada of those who apply for Citizenship under the new provision while their application is in process.
7. Extend the bill to those who received services from territorial child welfare agencies.
8. Require compliance with international human rights law.

In addition, we urge the Committee to call on the Government of Canada to:

9. Waive application fees for those applying under this new provision.
10. Collect and share relevant data.
11. Provide resources to agencies that assist applicants in applying for citizenship under the new provision.²

¹ Description and membership list attached at Appendix A.

² Summary of specific amendments attached as Appendix B.

A. Background

The agencies and advocates who have come together under the OCOSOR umbrella represent and/or assist scores of former cross-over youth – that is, people who came to Canada as children, often as permanent residents; were taken into “care” or supervision by child welfare authorities; and crossed over from child welfare system to the criminal justice system, swept into what’s been called the child welfare to prison pipeline.³

The large majority of these individuals are racialized; in Toronto, for example, 57% of youth in state care identify as Black, in a city where only 8% of the general population so identify.⁴ That over-representation continues in Canada’s prisons.⁵

While the harm done to cross-over youth is well documented, when it comes to youth who weren’t born in Canada and are not citizens, there is a further harm: for them, the pipeline from child welfare extends not just to prison, but continues on from prison to deportation. By the time children age out of care, many have no idea that their legal status is any different from that of their peers: having in many cases grown up in Canada, many simply – reasonably - assume they are citizens. The first these young people learn that they actually haven’t been recognized as full members of the country in which they have grown up is when officers with the Canada Border Services Agency (“CBSA”) visit them in prison, and inform them that they are facing the prospect of deportation once they complete their sentences.

By this point in their lives, after years of often traumatic experiences in the child welfare and criminal justice systems, many are experiencing mental illness, and now they are exposed to yet another assault on their dignity: banishment, to a county many do not even know and where they may not even speak the language.

It is the ultimate rejection, by the country they thought was theirs. The final failure of the system.

Bill S-235 can help rectify that injustice. It presents an opportunity to take a small but bold and desperately needed step towards undoing some of the harm of systemic racism in the child welfare, criminal justice and immigration enforcement systems by acknowledging these racialized members of society as legitimate rights-holders and full members of the Canadian community.

B. Ministerial Instructions are no substitute for Citizenship

In testimony before the Committee, government witnesses noted the issuance of Ministerial Instructions in July 2023 permitting immigration officials to consider granting Temporary Resident Permits to the class of individuals covered by Bill S-235. While certainly a very welcome development, OCOSOR wishes to make it clear that these

³ [Navigating quicksand final.pdf \(youthrex.com\)](#), part 14 Theme 1

⁴ Ibid.

⁵ [Overrepresentation of Black People in the Canadian Criminal Justice System](#)

instructions and the remedy of TRPs is in no sense an adequate substitute for a provision granting citizenship.

Ministerial Instructions are discretionary exercises by the Minister, constituting non-binding "recommendations" to decision makers to *consider* granting TRPs. The Instructions can be withdrawn by the current Minister or a future Minister without notice or reasons, with no legislative oversight or parliamentary approval, and with no public input or other procedural protection.

In contrast, Bill S-235 would establish rights in law that must be adhered to by the Minister and officials exercising delegated authority, including under future governments, with oversight by the Courts.

Nor is a TRP an adequate alternative to a grant of citizenship. Unlike citizens, persons on TRPs:

- Are under perpetual threat of removal upon expiry of the permit
- Have no legal right to remain in Canada beyond the duration of the TRP, and even the TRP can be cancelled for a perceived breach of conditions
- Depending on the particular TRP category, the successful applicant:
 - may or may not have the right to re-enter Canada if they take a trip abroad
 - may or may not have access to provincial health insurance,
 - may or may not have the right to work and study (in most cases will need to apply for work and study permits)
 - even if they get a study permit, they will be required to pay international student fees, i.e. 5 or 6 times what Canadian citizens pay, with no access to Canadian student loans
- Have no right to participate in the democratic process - no right to vote or to hold political office;
- Are ineligible for a Canadian passport to travel outside of Canada;
- Cannot sponsor a family member or spouse from abroad

The Ministerial Instructions re TRPs must therefore be understood as an inherently *temporary* solution to ensure that these individuals are not removed and have at least some status in Canada while a more just and permanent solution – Citizenship – is secured.

C. Recommendations

While OCOSOR strongly supports Bill S-235, several amendments are needed to ensure that it operates as intended and does not unjustly exclude any deserving individuals or groups.

Address government concerns re inadvertent expansion of categories, ambiguity re timing and retroactivity, operational impacts

In an appearance before the committee, IRCC asserted that Bill S-235 does not align with the categories of citizenship outlined in the Citizenship Act.⁶ While we maintain that Parliament is not constrained by categories set out in current legislation, we acknowledge the concern about inadvertent impacts.

Government officials also expressed concern about the need to clarify the date upon which individuals subject to the Bill become citizens and about whether the Bill has retroactive effect.⁷

These concerns can be met by shifting the provisions of Bill S-235 out of s. 3 (citizenship as of right) and into s. 5 (citizenship by way of grant). This shift would also eliminate government concerns around whether an affected individual consents to Canadian citizenship⁸ and would simplify the Bill by allowing the removal of s. 1(2) (by requiring individuals to submit applications for Canadian citizenship there is no longer any risk of their being granted citizenship without their consent) and s. 3 (a consequential amendment to the *Immigration and Refugee Protection Act* related to s. 1(2)).

This shift of the provision to s. 5 of the Citizenship Act would be consistent with the bill's intent, as long as eligibility remains broad and no substantial further eligibility requirements are added. It would clarify the date upon which affected persons become citizens (when the Minister grants them citizenship) and eliminate any ambiguity around possible retroactive effect (there would be none). Moreover, because ss. 5.1 and 5.2 of the Citizenship Act deal with citizenship by adoption, inserting the new provision, as s. 5.3, immediately following the adoption provisions would clarify the intention⁹ to mirror the citizenship-by-adoption provision.

⁶ Canada, Parliament, Senate, Standing Committee on Social Affairs, Science and Technology, *Evidence*, 44th Parliament, 1st Session, 23 November 2023: Testimony of Pemi Gill, Assistant Deputy Minister, Citizenship and Passport, Immigration, Refugees and Citizenship Canada.

⁷ *Ibid.*, Testimony of Richard St Marseille, Director General, Immigration and External Review Policy, Strategic Policy Branch, Canada Border Services Agency and Anna Turinov, Counsel, Legal Services Representative, Immigration, Refugees and Citizenship Canada

⁸ *Ibid.*, Testimony of Pemi Gill, Assistant Deputy Minister, Citizenship and Passport, Immigration, Refugees and Citizenship Canada; and Uyen Hoang, Acting Director General, Immigration, Refugees and Citizenship Canada; and Richard St Marseille, Director General, Immigration and External Review Policy, Strategic Policy Branch, Canada Border Services Agency

⁹ *Ibid.*, Testimony of Senator Mobina Jaffer.

→ **Recommendation 1: Shift the Bill S-235 provisions out of s. 3 and into s. 5 of the Citizenship Act, so that eligible persons become Canadian citizens by way of grant rather than as of right.** This can be done as follows:

Page 2:

-Amend line 4 to replace “1(1)” with “1” and to replace “3(1)” with 5;

-Amend line 6 to replace “(p)” with “5.2”

-Amend line 7 to replace “(p.1) subject to subsection (1.5),” with “(5.3) The Minister shall, on application, grant citizenship to a person who:”

-Amend line 8 by deleting the clause “the person was a minor who”

Page 3:

-Renumber s.2 of the Bill as s. 3

-Amend line 13 to replace “3(1)(p.1)” with “5.2”

-Amend lines 14-15 to replace “is a citizen under paragraph 3(1)(p.1)” with “meets the requirements of paragraph 5.3”

-As it is no longer required if the operable provisions are shifted to s. 5 as set out above and require a person to make an application, remove the provision relating to inadvertent loss of citizenship of another country. This can be done by amending page 3 lines 3-11 by deleting them (i.e. the entirety of section 2(2) of the bill)

Remedy inadvertent exclusion of some affected persons

As currently drafted the bill excludes from citizenship some vulnerable persons who were under the care mandate of child welfare agencies – that is, who child welfare agencies determined required their assistance – but who received informal care arrangements. This includes, for example, children and youth who:

- received services to improve their living conditions when they were not residing with a relative under an agreement, including those who enter into voluntary agreements for child welfare services;
- remained in the “care and custody of their parent,” while receiving services from a child welfare authority;
- were placed in care with kith or kin.

These categories of individuals were found by child welfare agencies to require some degree of their support and supervision, yet those agencies nevertheless failed to

secure Canadian citizenship for them; as such they are equally deserving of protection under this bill.

- **Recommendation 2: Include individuals who were in informal care arrangements.** This can be done by amending page 2, lines 34-35, to delete the words ("when they were not residing with a relative under an agreement made with") and insert the word "by." The amended paragraph would read:

(C) the person was provided with services to improve their living conditions by an agency appointed by a province or territory, including ...

As currently drafted, the bill would exclude persons who were returned to the care of a parent before they turned 18. We understand the premise motivating that restriction to be that when such children or youth were returned to their parent the responsibility to obtain citizenship for them also transferred back to the parent. As drafted, however, this restriction would even apply if a youth were returned to a parent weeks or even days before their 18th birthday, in which case there would not have been a realistic opportunity for the parent to apply for and obtain citizenship for them before they turned 18. Currently the average processing time for a citizenship application is 16 months from date of receipt of the completed application.¹⁰ Parents who regain custody of their child must be allowed a reasonable amount of time to prepare and submit a citizenship application and receive a decision if this restriction is to be fair.

- **Recommendation 3: Limit the exclusion of children returned to their parent to those who were returned before reaching 16 years of age.** This can be done by amending page 3, line 2, to add the following clause at the end of the paragraph, prior to the semicolon: "*unless the return took place after the child reached the age of 16.*" The amended paragraph would read:

(ii) the person was not returned to the care and custody of their parent when any of the circumstances described in clauses (i)(A) to (C) ceased to apply to that person, unless the return took place after the child reached the age of 16.

Specify time in care

As noted by Senator Jaffer¹¹, as currently drafted the bill is unclear about how long a person needs to have been under the supervision or in receipt of services from a child welfare agency in order to qualify for citizenship. Senator Jaffer proposed an amendment to clarify that the time in care should be, cumulatively, a year. While we support an amendment to clarify the amount of time in care required for eligibility, a review of evidence and discussion among coalition partners and other experts suggests that a cumulative minimum amount of time of six months would be a more appropriate period and would avoid inadvertent exclusion of deserving applicants. One published

¹⁰ [Apply for citizenship: After you apply - Canada.ca](#)

¹¹ Ibid.

report, for example, from the Ontario Association of Children's Aid Societies, indicates that between 2010 and 2017, more than half (61%-64%) of children exited care within 12 months post-admission.¹²

- **Recommendation 4: Impose a 180-days-in-care requirement.** This can be done by amending page 3 line 3 to add the following subclause: “(iii) the person was subject to the conditions described in clauses (i)(A) to (C) for at least 180 days, cumulatively;”

Provide discretion

Given the wide range and diversity of experiences of children with the variety of provincial and territorial agencies and mandates across the country, there is significant risk that even with the proposed amendments, some otherwise deserving persons will be inadvertently excluded unless provision is made for granting exceptions. We propose amending the bill to add a discretion clause mirroring the one in paragraph 5(3) of the *Citizenship Act*.

- **Recommendation 5: Grant the Minister discretion to waive requirements on humanitarian and compassionate grounds.** This can be done by amending page 3, line 3 to add a new paragraph as follows:

*5.3 (a) The Minister may, in their discretion, after having reviewed a person's particular circumstances, waive on compassionate grounds the requirements of paragraph 5.3 (i)-(iii).*¹³

Stay removal

Given the extraordinary vulnerability and marginalization of members of the affected community, it is reasonable to expect that many will not become aware of their eligibility for Canadian citizenship under the new provision until they come into contact with immigration enforcement officials. In order to ensure that such persons are not removed from Canada before they have an opportunity to apply or while their applications are in process, their removal should be stayed under the *Immigration and Refugee Protection Act*.

- **Recommendation 6: Stay the removal of persons who have made an application for citizenship under the new provision.** This can be done by replacing s. 3 of Bill S-235, an amendment to s. 48 of the *Immigration and Refugee Protection Act* (IRPA) which is no longer needed in light of the shift of the provision from s. 3 to s. 5, with an amendment to s. 50 of the IRPA, as follows:

¹² [Permanency-Indicator-Time-to-Permanency-Nov-2019.pdf \(oacas.org\)](#)

¹³ If additional requirements are appended to the provision, ensure that these are also made subject to this discretion.

-Amend page 3 lines 20-26 by replacing them with the following:

"4. Section 50 of the Immigration and Refugee Protection Act is amended by adding the following after subsection (e):

(f) in the case of a foreign national who made an application under s. 5.3 of the Citizenship Act, until a final decision has been made on the application."

Include reference to territorial child welfare agencies

As currently drafted, the bill refers only to provincial agencies. Absent any discernable rationale for the limitation, this should be corrected.

→ **Recommendation 7: Include children who were under the care of territorial child welfare agencies.** This can be done by amending page 2 lines 23, 25, 31, 36, 38, 40 to add the words "or territory" after the word "province"

Require compliance with international human rights law

As a signatory to many international human rights treaties, Canada must make every effort to ensure that decision makers and courts interpret legislation like the *Citizenship Act* in conformity with those treaties, especially when resolving ambiguities in the statute and exercising discretion. In the context of the present Bill, international instruments such as the *Convention on the Rights of the Child*, in particular, should inform how provisions are interpreted and applied.

Section 3 of the *Immigration and Refugee Protection Act* contains a provision requiring that Act to be construed and applied in a manner that "complies with international human rights instruments to which Canada is signatory." A similar provision should be added to the *Citizenship Act* to ensure consistency and compliance with international obligations under this legislation as well.

→ **Recommendation 8: Require compliance with international human rights law.** This can be done as follows:

-Amend page 4 line 4 by inserting a new section as follows:

"1. Section 2 of the Citizenship Act is amended by adding the following after paragraph (2):

"(3) This Act is to be construed and applied in a manner that complies with international human rights instruments to which Canada is signatory."

Call on the Government of Canada to waive application fees, collect and share data, and provide resources to agencies that assist applicants

In addition to making the above-noted amendments to Bill S-235, OCOSOR urges the Committee to make a number of recommendations to the Government of Canada to support the successful implementation of the new provision.

→ Recommendation 9: Call on the GoC to waive application fees

To ensure that there is equitable access for this vulnerable group, the Committee should urge the Government of Canada to waive citizenship application fees, which aligns with the existing policy of waiving Temporary Resident Permit application fees for the same population.

→ Recommendation 10: Call on the GoC to collect and disseminate data

Government and NGO witnesses appearing before the Committee have all pointed to the lack of available statistical data when discussions of foreign nationals in state care took place before the Committee. To ensure accountability and transparency, the Committee should call on the Government of Canada to collect and share data with involved parties at regular intervals. This should include information regarding:

1. Country of origin;
2. Race of Applicant;
3. Gender of Applicant;
4. Age of Applicant at time of Application;
5. Immigration status at date of application;
6. Location of Applicant at time of Application (in-country or outside of Canada);
7. If outside Canada, length of time spent outside Canada, whether Applicant was deported or voluntarily left the country;
 - a. Length of time Applicant spent in the child welfare system;
 - b. Length of time Applicant spent incarcerated.

→ Recommendation 11: Call on the GoC to provide resources to agencies that assist applicants in applying for citizenship under the new provision

The undertaking of obtaining citizenship for the survivors of the child welfare system will present challenges.

The child welfare and immigration systems already overburdened. To ensure that Applicants have access to effective assistance and representation, the Committee should urge Government of Canada to provide financial resources to agencies and organizations tasked with assisting the former child welfare survivors, to reduce the administrative and other burdens they may face when assisting their clients.

D. Response to issues raised by government witnesses

OCOSOR also wished to respond to some of the concerns identified by government witnesses during their appearance before the committee. In particular, IRCC witnesses asserted that:

1. The bill may “incentiviz[e] placing children in care, such as children being sent to Canada unaccompanied for the purpose of securing citizenship.”¹⁴

OCOSOR comment: This assertion should be dismissed as it is not rooted in reality. Despite repeated opportunities, the witnesses were unable to provide *any* evidence to support the assertion.

2. The bill may “create differential treatment between youth based on the circumstances of their care as children. Minors who spent time in the child protection system and were returned to the care of their parent or those who were never in the child protection system would not benefit from automatic citizenship and would remain at risk of removal from Canada if they are found to be inadmissible under the Immigration and Refugee Protection Act.”¹⁵

OCOSOR comment: To be sure, broader amendments to the *Citizenship Act* would be very welcome, as this Bill provides redress only to a specific category or subset of migrants who entered Canada as minors and were subsequently found inadmissible as adults: those for whom Canadian child welfare authorities took responsibility but failed to secure citizenship. For the reasons set out above, the proposed amendment seeks to redress the particular harm suffered by these minors as a result of their involvement in a system characterized by systemic racism. Unless the Government of Canada is proposing a broader, more inclusive amendment to grant citizenship to all persons who entered Canada as minors, regardless of inadmissibility – which certainly did not appear to be the thrust of the testimony – then the fact that the bill is targeted at a particular injustice is not a valid reason to reject it.

3. The bill may “provide citizenship in a manner that is not in alignment with the scheme of the Citizenship Act as it is today.”¹⁶

OCOSOR comment: While we maintain that Parliament is not constrained by categories set out in current legislation, we proposed an amendment, above, to resolve the issue by shifting the provision from s. 3 to s. 5 of the Citizenship Act.

In addition, the CBSA witness asserted that:

¹⁴ Ibid.: Testimony of Pemi Gill, Assistant Deputy Minister, Citizenship and Passport, Immigration, Refugees and Citizenship Canada.

¹⁵ Ibid.

¹⁶ Ibid.

4. “By focusing only on the end of the immigration enforcement process, Bill S-235 may have the unintended consequence of adding the burden of inadmissibility proceedings on the vulnerable population it is seeking to facilitate.”¹⁷

OCOSOR comment: OCOSOR’s proposal to shift the provision from s. 3 to s. 5 of the Citizenship Act, above, would resolve the concern.

5. Bill S-235 as drafted is also silent on the duration of the stay of removal.¹⁸

OCOSOR comment: OCOSOR’s proposal to shift the provision from s. 3 to s. 5 of the Citizenship Act, above, would resolve the concern.

6. Bill S-235 does not include transitional provisions as to whom the various provisions apply. For instance, it is possible that it may apply to those who have already been removed from Canada on an enforceable removal order.¹⁹

OCOSOR comment: We believe that the bill should and does apply to those who have already been removed from Canada on an enforceable removal. If these persons otherwise fit within the parameters of the bill, they are individuals who have in some ways suffered the most from the failure of the Canadian system and are most in need of a remedy.²⁰

¹⁷ Ibid., Testimony of Richard St Marseille, Director General, Immigration and External Review Policy, Strategic Policy Branch, Canada Border Services Agency

¹⁸ Ibid.

¹⁹ Ibid.

²⁰ At the same time, we acknowledge that an open-ended provision with no temporal limitations may be undesirable to the legislature from a policy perspective. If this is indeed a concern for the Senate, then an amendment could be introduced to limit eligibility to those who have not been outside of Canada for more than 15 years since reaching age of 18. This could be done by amending page 3 line 3 by adding the following: “(iv) the person has not resided outside of Canada for more than 15 years since reaching the age of 18.”

Appendix A: About the Coalition

Our System, Our Children, Our Responsibility: A Campaign Against the Deportation of Child Welfare Survivors is a coalition steered by the Black Legal Action Centre (BLAC)* that seeks to end the deportations of child welfare survivors and to address the related immigration issues. Participating organizations include:

Black Legal Action Centre
Bordering Practices Research Team
Canadian Association of Refugee Lawyers
Canadian Civil Liberties Association
Canadian Council for Refugees
Centre for Refugee Children
Chinese Southeast Asian Legal Clinic
Coalition of Child Welfare Survivors
Immigration and Refugee Legal Clinic
Justice for Children and Youth - Childhood Arrivals Support and Advocacy Program
Midaynta Community Services
Ontario Council of Agencies Serving Immigrants
PATH Legal
Peacebuilders International
Refugee Law Office
South Asian Legal Clinic of Ontario

Contact:

OUR SYSTEM, OUR CHILDREN, OUR RESPONSIBILITY
c/o Black Legal Action Centre
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Toronto, ON M5S 2T9
Phone: 416-597-5831
Fax: 416-975-5156
General Toll Free: 1-877-736-9406
Correctional Facilities Toll Free: 1-877-279-0680
TTY (through Bell's relay service): 1 800 855 0511
Direct Email re the Coalition: anil.philip@blac.clcj.ca
General Email: info@blac.clcj.ca
Website: www.blacklegalactioncentre.ca

Appendix B: Summary of recommendations and proposed amendments

RECOMMENDATIONS	PROPOSED AMENDMENTS TO IMPLEMENT THE RECOMMENDATIONS
<p>1. Shift the Bill S-235 provisions out of s. 3 and into s. 5 of the <i>Citizenship Act</i>, so that eligible persons become Canadian citizens by way of grant rather than as of right.</p>	<p><u>Page 2:</u></p> <p>Amend line 4 to replace “1(1)” with “1” and to replace “3(1)” with 5;</p> <p>Amend line 6 to replace “(p)” with “5.2”</p> <p>Amend line 7 to replace “(p.1) subject to subsection (1.5),” with “(5.3) The Minister shall, on application, grant citizenship to a person who:”</p> <p>Amend line 8 by deleting the clause “the person was a minor who”</p> <p><u>Page 3:</u> Renumber s.2 of the Bill as s. 3</p> <p>Amend line 13 to replace “3(1)(p.1)” with “5.2”</p> <p>Amend lines 14-15 to replace “is a citizen under paragraph 3(1)(p.1)” with “meets the requirements of paragraph 5.3”</p> <p>Delete lines 3-11 (i.e. the entirety of section 2(2) of the bill)</p>
<p>2. Include individuals who were in informal care arrangements.</p>	<p>Amend page 2, lines 34-35, to delete the words (“when they were not residing with a relative under an agreement made with”) and insert the word “by.” The amended paragraph would read:</p> <p style="text-align: center;"><i>(C) the person was provided with services to improve their living conditions by an agency appointed by a province or territory, including ...</i></p>
<p>3. Limit the exclusion of children returned to their parent to those who were returned before reaching 16 years of age.</p>	<p>Amend page 3, line 2, to add the following clause at the end of the paragraph, prior to the semicolon:</p>

	<i>“unless the return took place after the child reached the age of 16.”</i>
4. Impose a cumulative 180-days-in-care requirement.	Amend page 3 line 3 to add the following subclause: <i>(iii) the person was subject to the conditions described in clauses (i)(A) to (C) for at least 180 days, cumulatively;”</i>
5. Grant the Minister discretion to waive requirements on humanitarian and compassionate grounds.	Amend page 3, line 3 to add a new paragraph as follows: 5.3 (a) <i>The Minister may, in their discretion, after having reviewed a person's particular circumstances, waive on compassionate grounds the requirements of paragraph 5.3 (i)-(iii)²¹.</i>
6. Stay the removal of persons who have made an application for citizenship under the new provision.	Amend page 3 lines 20-26 by replacing them with the following: 4. Section 50 of the Immigration and Refugee Protection Act is amended by adding the following after subsection (e): <i>(f) in the case of a foreign national who made an application under s. 5.3 of the Citizenship Act, until a final decision has been made on the application.</i>
7. Extend the bill to those who received services from territorial child welfare agencies.	Amend page 2 lines 23, 25, 31, 36, 38, 40 to add the words “or territory” after the word “province”
8. Require compliance with international human rights law.	Amend page 4 line 4 by inserting a new section as follows: 1. Section 2 of the Citizenship Act is amended by adding the following after paragraph (2): <i>“(3) This Act is to be construed and applied in a manner that complies with international human rights instruments to which Canada is signatory.</i>

²¹ If additional requirements are appended to the provision, ensure that these are also made subject to this discretion.

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| <p>9. Call on the GoC to waive application fees.</p> <p>10. Call on the GoC to collect and disseminate relevant data, including re:</p> <ul style="list-style-type: none">(a) Country of origin;(b) Race of Applicant;(c) Gender of Applicant;(d) Age of Applicant at time of Application;(e) Immigration status at date of application;(f) Location of Applicant at time of Application (in-country or outside of Canada);(g) If outside Canada, length of time spent outside Canada, whether Applicant was deported or voluntarily left the country;<ul style="list-style-type: none">i. Length of time Applicant spent in the child welfare system;ii. Length of time Applicant spent incarcerated. <p>11. Call on the GoC to provide resources to agencies that assist applicants in applying for citizenship under the new provision.</p> | |
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