August 31, 2026
Patrick Weiler, MP

Subject: Urgent Policy Advocacy: Reinstating Concurrent Processing for LMIA-Supported Work Permits

To whom is concerns,

I am writing to provide insight regarding the Temporary Foreign Worker Program (TFWP) and the current policy of Immigration, Refugees and Citizenship Canada (IRCC) to limit concurrent processing to LMIA-supported work permit applications to 90 days. This policy is causing severe operational disruptions for British Columbia businesses and creating highly vulnerable situations for foreign workers.

We are seeking the reinstatement of indefinite concurrent processing for work permit applications tied to pending Labour Market Impact Assessments (LMIAs).

The Policy Shift and Processing Realities

In January 2023, IRCC quietly updated its policy manual to strictly limit the concurrent processing of LMIAs to a maximum of 60 days (IRCC Operational Bulletin). Prior to this change, a work permit application would be held in processing indefinitely until Service Canada made a final decision on the underlying LMIA. Though the policy was published in early 2023 without a formal announcement, it only began to be strictly enforced in late 2023 and early 2024. An update to 90 days was made in August, 2026.

The stated intent of the cap is to discourage employers from filing LMIAs at the last minute. However, this policy completely fails to account for the skyrocketing processing times at Service Canada, which currently do not reflect their stated service standards:

- **High-Wage LMIAs:** The stated processing time is 79 business days (approx. 3.6 months). In practice, these applications are taking **4.5 to 5 months**.
- **Low-Wage LMIAs (positions under $38.85/hr in BC):** The stated processing time is 71 days. In practice, based on professional experience these are taking **over 5 months (up to 25 weeks)**.
- **Work Permits:** Current processing for the permits themselves is hovering around **4 to 5 months**.

The Burden on Employers

Because of these processing delays, it is virtually impossible for businesses to align their hiring needs with the government's rigid timelines. For a low-wage LMIA, an employer must complete eight weeks of mandated advertising before they can even file the application. Followed by approximately 25 weeks of processing, the best-case scenario is a **6-to-7-month lead time** from the start of advertising to the issuance of a positive LMIA—all to secure a worker for a position that is only valid for one year. High-wage positions require four weeks of advertising but still demand over six months of advanced planning.

Few employers can plan a vacancy six to seven months ahead, especially when hiring a foreign worker is meant as a last resort. Consequently, when an employer finally identifies a candidate and initiates the process late into the worker's current permit validity, the cap often means the worker will fall out of status while waiting on the government's own backlog.

A "Lose-Lose" Scenario: The Economic and Human Cost

When the 90-day concurrent processing window expires and the LMIA is still stuck in the Service Canada queue, the work permit is refused. This triggers a catastrophic fallout with essentially two options, both of which harm the BC economies:

1. Restoration of Status from Within Canada:

The worker can apply to restore their status, which takes three to six months to process. During this time, they are legally prohibited from working and lose their provincial health care coverage. Employers are left with a critical vacancy they cannot fill (the very reason they applied for the LMIA), and the worker is pushed into a highly precarious state, often facing financial insecurity or being forced into the underground economy to survive.

2. Leaving Canada to Reapply:

Alternatively, the worker must leave the country. If they are from a visa-exempt country, they must pay for a costly international flight (as they cannot easily use the US border for this purpose) to re-enter and apply at the port of entry. If they require a visa, they face high travel costs and must wait three to six months in their home country for a new permit to be issued. Because these costs are prohibitive, many workers remain in Canada out of status.

Recommendations for Advocacy on Processing Times

The 90-day limit on concurrent processing penalizes employers and workers for administrative delays they do not control. We strongly urge you to advocate for a multi-pronged approach to fix this administrative bottleneck:

1. Reinstate Indefinite Concurrent Processing (Primary Ask)

- IRCC must immediately restore the pre-2023 policy allowing work permit applications to remain in processing indefinitely until Employment and Social Development Canada (ESDC) reaches a final decision on the underlying LMIA. No work permit should be refused solely because the government's own LMIA processing queue has exceeded 90 days.
- If an employer has a verifiable LMIA application in the queue, the current worker should be legally permitted to continue working and accessing provincial health care until a decision is rendered, bridging the gap without penalizing the business or the worker.

2. Implement Service Standard Accountability at ESDC

- The government must be held accountable to Service Canada's posted processing times of 71–79 business days. We recommend advocating for a policy where, if ESDC fails to process an LMIA within their stated service standards, the employer is refunded the $1,000 application fee, and any associated work permits are automatically fast-tracked.

3. Mandate Better Inter-Departmental Integration (IRCC & ESDC)

- Currently, the system acts in silos. We urge the government to establish a direct communication pipeline between ESDC and IRCC. An IRCC officer should be able to instantly verify that an LMIA is stuck in an ESDC backlog and pause the work permit refusal process accordingly, rather than punishing the applicant for cross-departmental inefficiencies.

4. Create Regional or Sectoral Exemptions

- If a blanket reversal is not feasible, IRCC should implement concurrent processing exemptions for critical sectors in BC (such as healthcare, trades, tourism and agriculture) or for rural and remote communities where losing a single worker to administrative delays can force a business to drastically reduce operating hours or close entirely.

Recommendations for Advocacy on International Workers

Rural and resort communities face unique labour market conditions, including low unemployment rates and ongoing challenges in attracting and retaining workers. Tailored, coordinated solutions are required to ensure these communities can continue to thrive economically and socially. We recognize the importance of maintaining safeguards to ensure Canadians remain first in line for available jobs, while also acknowledging the essential role that international workers play in sustaining key sectors and services.

We urge all levels of government to work collaboratively with communities, employers, and support organizations to implement both immediate and long-term solutions that address workforce needs while supporting inclusion, dignity, and opportunity for all workers.

1. **Strengthen Long-Term Immigration Pathways and Tailored Solutions for Rural and Resort Communities**
   Improve permanent residency pathways for tourism and hospitality workers in rural communities by supporting and expanding programs that enable workforce retention and community integration. Increase BC's Provincial Nominee Program allocation and expand models such as REDI or RCIP to provide meaningful pathways to permanent residency for workers in rural areas.

2. **Strengthen and Modernize Programs to Access Temporary Workers**
   The entire TFWP needs strengthened and modernized to better support rural / resort communities and provide security and support for employees.

3. **Increase Provincial Investment in Settlement and Migrant Worker Supports**
   Settlement services are essential in helping individuals and families build stability, access services, and contribute meaningfully to the community. Increased and sustained provincial funding is critical to ensure these programs can meet growing demand and continue to deliver impactful outcomes, both at initial arrive and across the settlement continuum.

4. **Adress Workforce Barriers and Prioritize Dignified and Attainable Housing Solutions**
   Housing remains a key barrier to workforce retention. Continued investment in housing initiatives is essential. Expanding access to dignified, secure housing – particularly for individuals on legal work permits – must remain a shared priority across all levels of government.

   Improved access to childcare and public transit options are also necessary. Addressing workforce, housing and transportation together is essential to supporting strong local economies and livable communities.

5. **Promote Inclusive and Equitable Workplaces**
   Whistler's Workplace Inclusion Charter, developed in collaboration with local partners, provides a framework for employers to commit to fair treatment, cultural inclusion, safe and respectful workplaces, and employee wellbeing. Broader adoption of the Charter, alongside education and accountability measures, can help strengthen workplace standards and improve outcomes for migrant workers.

6. **Consultations with employers, workers and industry associations**
   Engage rural and resort communities including municipal government and industry to ensure the effective implementation of long-term immigration pathways.

Thank you for your consideration and continued support of rural and resort communities across British Columbia.

Yours sincerely,



Louise Walker
Executive Director
Whistler Chamber of Commerce