

August 17, 2026

Via Email: minister@cic.gc.ca

The Honourable Lena M. Diab
Minister of Immigration, Refugees, and Citizenship
365 Laurier Avenue West
Ottawa, Ontario K1A 1L1

Dear Minister Diab,

I write on behalf of the Canadian Immigration Lawyers Association (“CILA”) to recommend amendments to the Parents and Grandparents Super Visa Program (“Super Visa Program”) to create a reasonable mechanism allowing certain eligible Super Visa holders to apply for extensions or renewals from within Canada.

CILA is comprised of some 540 immigration lawyers across Canada dedicated to promoting access to justice and fairness in the immigration system. Since our inception in 2020, we have enjoyed constructive dialogue with various Ministers and Deputy Ministers at IRCC.

Our members regularly assist Canadian citizens and permanent residents who seek to reunite with their parents and grandparents through the Super Visa Program. While we recognize the important role that the Super Visa Program plays in facilitating family reunification, we believe that certain aspects of the current renewal process create unnecessary hardship, particularly for elderly parents and grandparents and those with medical vulnerabilities.

For many families, requiring a parent or grandparent to undertake international travel merely to submit a renewal application is neither practical nor compassionate. We respectfully recommend that IRCC establish an in-Canada Super Visa extension or renewal pathway for applicants who meet appropriate eligibility criteria, including, for example:

- Parents and grandparents over a specified age threshold, such as 65 years or older;
- Applicants whose physicians have advised that international travel is medically inadvisable or unsafe;
- Applicants with disabilities, mobility limitations, or medical conditions that create significant barriers or risks associated with international travel; and
- Other vulnerable applicants who can demonstrate that requiring international travel solely for visa renewal would create unreasonable hardship.



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1. Super Visa is the Only Practical Option to Maintain Meaningful Family Unity

The importance of the Super Visa Program must be considered within the broader context of Canada's Parents and Grandparents Program ("PGP"). When the PGP is paused or unavailable to many eligible families, the Super Visa becomes the only realistic avenue for Canadian citizens and permanent residents to be reunited with their parents and grandparents for extended periods.

Parents and grandparents are more than temporary visitors to Canada. They play a vital role in supporting Canadian families and contribute to Canadian society. By providing emotional support and assistance with daily household responsibilities, they help create stable family environments that enable their children and grandchildren to participate fully in the workforce and contribute to Canada's economy. Their presence also reduces the need for Canadian families to interrupt their employment or travel abroad to care for aging parents.

When families cannot access permanent residence pathways, the Super Visa serves as the primary mechanism that allows families to remain together. Creating unnecessary barriers to maintaining Super Visa status effectively undermines the family reunification objectives of the program. A policy approach that closes or restricts permanent sponsorship opportunities while simultaneously creating barriers to the renewal of temporary family reunification mechanisms risks producing an unreasonable outcome.

2. In-Canada Renewal Presents a Low Risk to Program Integrity

Allowing eligible Super Visa holders to renew their status from within Canada would present a low risk to the integrity of Canada's immigration system. These individuals have already undergone immigration screening and have previously satisfied an officer that they met the requirements for temporary entry to Canada. In addition, Super Visa holders are required to maintain private health insurance, which reduces the concern that their continued stay would impose an undue burden on Canada's publicly funded healthcare system. Accordingly, a reasonable in-Canada renewal process would allow elderly and medically vulnerable Super Visa holders to maintain their status without compromising the integrity of the Super Visa Program.

3. Mandatory International Travel for Elderly Parents and Grandparents Creates Unnecessary and Avoidable Hardship

CILA is concerned that requiring elderly parents and grandparents to leave Canada in order to complete a Super Visa renewal process may create significant hardship and unnecessary risks. For many individuals over the age of 65, international travel is physically demanding, expensive, and increasingly complex. Extended international travel frequently involves long flights, airport transfers, exposure to infectious diseases, disruption of medical routines, and challenges in accessing appropriate healthcare.

Scientific literature recognizes that older travellers face increased health risks associated with international travel. According to Public Health Agency of Canada, seniors are more vulnerable to medical complications, including



heat stroke, renal failure, and adverse effects arising from exposure to extreme temperatures. Travel to high altitudes may require additional assessment because of limited cardiopulmonary reserve.¹

CILA submits that there is no benefit to Canada or Canadians in requiring parents or grandparents of naturalized Canadians to renew their status abroad when it can be done in Canada. The requirement may force elderly individuals to choose between risking their health through unnecessary travel or losing the ability to remain with their families in Canada.

4. The Current Process Raises Human Rights and Accommodation Concerns

From a human rights perspective, CILA respectfully submits that immigration processes should account for the realities of aging, disability, and medical vulnerability. Where an applicant cannot travel because of age-related limitations, disability, or medical reasons, requiring that person to leave Canada solely to submit an application may create a barrier based on protected grounds under Canadian human rights legislation.

The *Canadian Human Rights Act* affirms that “all individuals should have an opportunity equal with other individuals to make for themselves the lives that they are able and wish to have”². To achieve this objective, the Government of Canada has a responsibility to ensure that individuals’ needs are reasonably accommodated and that they are able to participate fully and equally without discrimination. Immigration processes are not exempt from these principles. IRCC has already recognized the importance of accommodation in other contexts. For example, IRCC provides alternative processes where applicants with disabilities are unable to use online application systems. This demonstrates that administrative requirements can and should be adapted where they create unreasonable barriers for vulnerable individuals.

Accordingly, where a Super Visa holder demonstrates that international travel is unsafe or unreasonable due to age, disability, or medical circumstances, IRCC should provide an accessible in-Canada renewal mechanism rather than requiring departure from Canada.

5. CILA’s Recommendations

We recognize that IRCC manages significant operational pressures and maintains program integrity. Allowing in-Canada renewal process for vulnerable Super Visa holders would not undermine program objectives. However, Canada’s immigration system is built upon principles of family reunification, fairness, and compassion. While

¹ Canada, Public Health Agency of Canada, Committee to Advise on Tropical Medicine and Travel, *Statement on Older Travellers*, Canada Communicable Disease Report, vol 37, ACS-2 (Ottawa: Public Health Agency of Canada, 2011) at 5. See also Tida K Lee et al, “Guidelines for the Prevention of Travel-Associated Illness in Older Adults” (2017) 3 *Tropical Diseases, Travel Medicine and Vaccines* 10 at 1.

² *Canadian Human Rights Act*, RSC 1985, c H-6, s 2.



temporary programs must maintain appropriate controls, those controls must also reflect the human realities of the people affected by them.

For these reasons, CILA recommends that the Government of Canada amend the Super Visa Program to permit eligible applicants, including those above a defined age threshold and those whose physicians have advised that international travel is unsafe or medically inadvisable, to apply for extensions or renewals from within Canada. We believe these recommendations represent a balanced approach that protects program integrity while ensuring fairness, compassion, and respect for vulnerable parents and grandparents.

We would welcome the opportunity to discuss these recommendations further with you and IRCC officials.

Yours sincerely,



Thanh C. Phan, PhD.
Board Director
Canadian Immigration Lawyers Association

