

SOCI: C-3 Submission

Andrew Griffith

Recommendations

1. IRCC conduct an analysis of the pending applications to inform the Senate regarding those most likely to apply under the proposed legislation;
2. Senators send back C-3 with the CIMM amendments for the five-year time limit for the residency requirement and annual data reporting; and,
3. Senators include in C-3, a requirement for annual reporting that would also include the numbers and country of residence of applicants for the simplified renunciation process.

The first-generation cut-off for citizenship by descent has a long history. It started with with efforts to broaden the focus of S-245 to include allowing citizenship by descent past the first generation, and the identical Bills C-71 and C-3, driven by the decision of the Federal Court that the first-generation cut-off was unconstitutional.

In my [previous submission](#) to the committee on C-71 in December 2024¹, I focussed on the lack of a time limit under which a second-generation parent could meet the residency requirement of 1,095 days, which undermines the whole purpose of determining a valid connection to Canada. SOCI at the time accepted the government's approach of not having a time limit.

While the House Citizenship and Immigration committee made a number of changes to C-3, the Government chose to revert to the original Bill.

This made sense with respect to house committee amendments that would require language and knowledge assessment as well as criminality and security

¹ Griffith, Andrew. Bill C-71: The need for a timeframe limit. 5 December 2024.

checks. The second generation, like the first generation born abroad, are claiming a right, and are not permanent residents applying to become citizens.

However, two amendments made by the [House immigration committee changed this provision](#) and improved the Bill.

The first requires that the residency requirement be met within any five-year period prior to the birth of a child², addressed my main concern regarding the difficulty for both applicants and IRCC to administer as well as creating a stronger connection test wherein the parent has to accumulate three years of residence (1,095 days) within a specific five year period.

The second amendment requires annual reporting on the number of persons becoming citizens as a result of the bill's provisions is equally needed in order to ensure adequate accountability.

The November 3 [Globe editorial](#)³ convincingly argued for the reinstatement of both of these provisions.

During testimony by the Minister and officials on October 2, the general weakness of the data presented and apparent confusion over whether exit controls exist (they don't) makes the data provision particularly important.

Moreover, IRCC provided no analysis of the number of persons likely to apply for the simplified renunciation process nor an estimate for any related costs.

IRCC only publishes one data set on citizenship on the Government's open data website out of more than 100 data sets. This is woefully inadequate for an important Government program.

Publication of data on citizenship proof applications, the appropriate measure for knowing how many are reclaiming their citizenship, stopped years ago.

We did learn that IRCC has received some 4,200 applications from the second generation born abroad to date. This is a large sample and IRCC needs to share data about these applications, such as gender, age, country of residence or origin.

² House Standing Committee on Citizenship and Immigration. 2 October 2025.

³ Globe and Mail. There can't be two types of Canadian citizen. 3 November 2025.

It would also be helpful for this analysis to examine whether a five-year limit to meet the residency requirement would have a material impact on eligibility. I expect that most people applying will have a strong connection to Canada and would be able to easily meet this requirement and be able to document it to the satisfaction of IRCC.

A related issue is the provision for a simplified process to renounce Canadian citizenship. The process recommended is practical but in order to ensure accountability, an annual report on numbers and country of residence of applicants is necessary.

To conclude, I would offer the Committee the following recommendations that arise from my comments:

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Andrew Griffith is the author of [*"Because it's 2015..." Implementing Diversity and Inclusion, Multiculturalism in Canada: Evidence and Anecdote*](#) and [*Policy Arrogance or Innocent Bias: Resetting Citizenship and Multiculturalism*](#) and is a regular media commentator and blogger ([Multiculturalism Meanderings](#)). He is the former Director General for Citizenship and Multiculturalism and has worked for a variety of government departments in Canada and abroad and is a fellow of the Environics Institute.