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Association of Canadian Archivists
Association canadienne des archivistes

October 7, 2026

The Honourable Lena Metlege Diab, Minister of Immigration, Refugees and Citizenship

Re: Federal support for archival institutions responding to Bill C-3

Dear Minister Diab:

The Association of Canadian Archivists (ACA) and the Canadian Cultural Heritage Advocacy Committee (CCHAC) are writing to express our concern about the sustained and growing workload being placed on archival institutions and workers as a result of requests for records related to Bill C-3 and citizenship-by-descent applications.

Archivists across Canada are committed to providing access to records for everyone who enquires, and to helping individuals locate the records that document their family histories and support their citizenship applications. This commitment is grounded in the high ethical and professional standards of care and duty that govern our profession. However, the implementation of Bill C-3 has created a substantial new demand for archival research at a time when archives across Canada are feeling the impact of the termination of the Documentary Heritage Communities Program, funding cuts to Library and Archives Canada, and the ongoing chronic underfunding of archives across the country.

In practice, archives and archivists have become the front line of this program for Immigration, Refugees and Citizenship Canada (IRCC). Archival institutions are fielding thousands of inquiries and are providing answers to applicants long before those applicants ever reach IRCC directly. This work is essential to the functioning of the program, yet it is neither recognized nor resourced.

At a recent meeting with IRCC, archivists were told that they “are not expected to meet the needs” of individuals seeking records and are not responsible for explaining government requirements to applicants. While ACA and CCHAC recognize that archivists cannot determine citizenship eligibility or provide immigration advice, this response does not take into account the profession’s ethical commitment to facilitating access to records, nor the practical reality archivists are experiencing across the country. Simply turning applicants away would be inconsistent with the archival profession’s commitment to serving the public equitably and transparently.

We must also note that consultation with the archival community regarding the effects of this program was scant, and the feedback that was provided has clearly not been taken into account. Archives were not meaningfully engaged before the program was implemented, even though government guidance directs applicants to archival institutions as a primary source of historical evidence. The consequences we describe in this letter were foreseeable, and archivists were well placed to help anticipate them.

Applicants are contacting archives because government guidance directs them to locate historical evidence held by archival institutions. Archivists must search dispersed and sometimes minimally described collections, many of which are not digitized nor easily accessible due to their often fragile states; communicate with applicants to refine searches; retrieve and reproduce relevant records; explain institutional procedures; document and, in some instances, certify records; communicate the results of

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unsuccessful searches; and respond to questions about formatting and requirements. Where an institution does not hold the relevant records, archivists must often conduct additional research to redirect applicants to the appropriate repository. All of this work also requires archivists to keep abreast of changing and, at times, inconsistent citizenship-application requirements communicated by IRCC. There is no database where all of these records are searchable all at once, and often the success of records retrieval is due primarily to the professional knowledge and talents of each archivist.

Preliminary information collected by ACA indicates that:

- participating institutions have experienced increases of approximately **1200%** in citizenship-related requests;
- responding institutions are collectively devoting approximately **520 hours per month** to this work;
- individual institutions have received as many as **145 requests** during the last completed month, **compared with 0–5 requests** in a typical month prior to the introduction of Bill C-3;
- the additional work is costing institutions approximately **$30,000** per month in staff time and direct expenses; and
- 88% of responding institutions have delayed other projects, increased response times, or redirected staff from core archival responsibilities.

If archival institutions were no longer able to provide this assistance, applicants would face significant delays or, in some cases, would be unable to locate the evidence needed to support their applications. Citizenship applications would, as a result, be submitted with incomplete documentation; applicants would have difficulty demonstrating that reasonable searches had been undertaken; IRCC officers would receive more inquiries and less reliable evidence. Extended delays may also contribute to disputes or court proceedings. We respectfully insist that it is in the interest of both IRCC and Canadian archives to collaborate on practical solutions that make the process more transparent, reliable, efficient, and consistent, while reducing the potential for fraudulent documentation.

Currently, archives are providing essential infrastructure for the implementation of federal citizenship policy. The costs of that implementation should not be downloaded onto not-for-profit institutions that are neither funded nor staffed to perform this additional work. In fact, many of these are religious archives, often having only one staff member and are financially under-resourced.

Based on data collected from our members, ACA estimates that approximately $7M annually in additional capacity is required to address the current level of Bill C-3-related demand across the most significantly affected archival institutions. This estimate illustrates the scale of the resources currently being absorbed by archives; we do not suggest that additional staffing alone should be the permanent or sole solution. A collaborative federal response should combine direct support with measures that reduce demand, improve applicant navigation, and create efficiencies over time.

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ACA and the CCHAC therefore urge the Government of Canada to establish, in genuine collaboration with the archival community, a coordinated and long-term response to citizenship-related archival demand. This response should include the following measures:

- **Additional staffing to cover the costs of research, retrieval, and reproduction.** This can be tied to retroactive billing to IRCC based on searches undertaken and time spent. Increased staffing will make the process more efficient for both IRCC and Canadian archives.
- **Applicant correspondence.** If this is built and managed by IRCC as a front-end means of directing applicants to the appropriate archives, the potential for fraud would be reduced, as an application trail could be followed if and when needed. It could also reduce the need for certification of documents.
- **Digitization.** If records pertaining to citizenship requests are digitized, over time this should reduce the need for funding for additional staffing.
- **AI tools.** Funding for this could come from the Ministry of Artificial Intelligence and Digital Innovation and be used first for licenses and tools, and second for student employment, with students trained in preservation, digitization, and the training of large language models on handwriting and spelling variations.
- **Public information and standardized resources that archives can provide to applicants.** IRCC should build and manage this front-end system in consultation with a user group of impacted archives, including those serving applicants with non-English- and non-French-speaking ancestors. This could begin as a pilot project starting immediately with two significantly impacted archives, one English and one French.

Support needs to be available to institutions of different sizes and types, including religious, municipal, university, community, provincial, territorial, and volunteer-run archives. We ask IRCC to work with the ACA, the CCHAC, affected archival institutions, and relevant federal partners to determine the appropriate mix of direct funding, cost recovery, digital infrastructure, and process improvements. This collaborative approach would recognize the immediate financial burden on archives while also investing in solutions that reduce that burden over time.

We ask that your office convene a meeting with the ACA, the CCHAC, departmental officials, and representatives of affected archives to review these findings and develop a sustainable and practical federal response. This time, the archival community must be a real partner in the conversation, and its expertise must shape the outcome. We believe this is a problem that government and the archival community can solve together so that the process is transparent, reliable, timely, and consistent for applicants, IRCC, and archival institutions alike. The success of Bill C-3 should not depend on archival institutions quietly absorbing significant new costs at the expense of their existing programs and responsibilities.

Thank you for your consideration. We look forward to your response.

Yours sincerely,

The Board of the Association of Canadian Archivists and the Canadian Cultural Heritage Advocacy Committee

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Cc: Leslie Weir, Librarian and Archivist of Canada
Marc Miller, Minister of Canadian Identity and Culture
Evan Solomon, Minister of Artificial Intelligence and Digital Innovation