Immigration, Refugees and Citizenship Canada | Immigration, Réfugiés et Citoyenneté Canada
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Archived: May 19, 2026 10:53:45 AM
From: Immigration Representatives / Représentants immigration (IRCC)
Sent: Thu, 12 Mar 2026 15:47:02
To:
Cc: Immigration Representatives / Représentants immigration (IRCC)
Subject: FW: FW: FW: FW: Bill C3 and the child who becomes a PR after the bill passed - REP-2026-0565 - Due: 9-Apr-26
Importance: Normal
Sensitivity: None

Good day,
Thank you for contacting the **Immigration Representatives Mailbox.**
Please note that this mailbox is intended for general guidance and does not provide responses to case-specific inquiries but have provided the following information as guidance. If you have case specific questions about a file, you are encouraged to submit the IRCC Web form.
Please see our response to your question.
***
Applicants (including children) who were born to a Canadian Citizen parent prior to December 15, 2025, may indeed now be described as a Canadian citizen by automatic operation of law as a result of the Bill C-3 changes to the *Citizenship Act*. Applicants who have a pending PR application will be contacted by IRCC to withdraw their immigration application and submit an application for Proof of Citizenship (or Adoption application if applicable); however, this may not be accurately identify all instances. Consequently, applicants who believe they may now have a claim to citizenship must submit an application a citizenship certificate. We encourage applicants to visit our website to better understand if they were impacted by the legislative changes here: Change to citizenship rules in 2025 - Canada.ca

Applicants born or adopted after December 15, 2025, in the second or subsequent generation abroad are encouraged to apply for a citizenship certificate before pursuing immigration options as they may also be described as citizens if their Canadian citizen parent spent at least 1,095 days physically present in Canada prior to the date of birth or adoption of their child.

Applicants who have already been approved through an immigration application process and may now have a claim to citizenship by descent as a result of the legislative changes should be advised to apply for a citizenship certificate to find out for sure. A person with a claim to citizenship is presumed Canadian through automatic operation of law and ineligible for immigration documents such as a permanent resident visa.

We cannot respond or verify case specific information for the scenario you outline in your request but can advise that clients who believe they may be described as citizens by descent should apply for a proof of citizenship as citizens are not eligible for immigration status nor a grant of citizenship.

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Thank you kindly,

The Immigration Representatives Mailbox

From:

Immigration, Refugees and Citizenship Canada / Immigration, Réfugiés et Citoyenneté Canada
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Sent: Tuesday, March 10, 2026 8:10 AM
To: Immigration Representatives / Représentants immigration (IRCC) <IRCC.ImmigrationRepresentatives-Representantsimmigration.IRCC@cic.gc.ca>
Subject: Re: FW: Bill C3 and the child who becomes a PR after the bill passed

CAUTION: This email originated from outside the Government of Canada. Do not click on links or open attachments unless you recognize the sender and know the content is safe.
ATTENTION: Ce courriel provient de l'extérieur du gouvernement du Canada. Ne cliquez pas sur les liens et n'ouvrez pas les pièces jointes sauf si vous reconnaissez l'expéditeur et sachez que le contenu est sûr.

Hello All,

Please note that my license is

Best regards,

On Tue, Mar 10, 2026 at 5:51 'a0AM Immigration Representatives / Représentants immigration (IRCC) <IRCC.ImmigrationRepresentatives-Representantsimmigration.IRCC@cic.gc.ca> wrote:

Hello,

In order to properly assist you, may you please provide your credentials as a Canadian Lawyer or Representative in good standing.

Thank you kindly,

The Immigration Representatives Mailbox

Bonjour,

Afin de mieux vous aider, pouvez-vous s'il vous plaît fournir vos accréditations en tant qu'avocat ou représentant canadien en règle.

Nous vous remercions ,

La boîte aux courriels des représentants en immigration

From:
Sent: Monday, March 9, 2026 3:57 PM
To: Immigration Representatives / Représentants immigration (IRCC) <IRCC.ImmigrationRepresentatives-Representantsimmigration.IRCC@cic.gc.ca>
Subject: Bill C3 and the child who becomes a PR after the bill passed

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Hello All,

We are writing to request general clarification regarding a file in which a minor child's permanent residence application under sponsorship by the Canadian parent was submitted before the recent amendments to the Citizenship Act came into effect, but the permanent residence application was approved after Bill C-3 became effective on December 15, 2025.
In general terms, the concern is whether a child in these circumstances may already have become a Canadian citizen by operation of law under the amended citizenship provisions before the permanent residence process was finalized. If so, there may be an inconsistency between the applicant's possible citizenship status and the subsequent approval of permanent residence. IRCC's public guidance indicates that certain persons affected by the new rules became citizens automatically as of December 15, 2025, and may instead pursue proof of citizenship.

We would be grateful for guidance on how IRCC wishes such cases to be addressed where:
the permanent residence application was filed before the legislative change, the applicant is a minor child, and the approval of permanent residence was issued only after the new citizenship provisions came into force.
More specifically, we seek clarification on whether, in such circumstances, IRCC's position would be that:
the permanent residence application should no longer proceed in the usual manner, the matter should be reviewed and corrected administratively,
or the applicant should instead proceed through proof of citizenship if they are now considered a citizen under the amended legislation.

In addition, if IRCC's position is that the child is not already a Canadian citizen by operation of law, we would appreciate clarification on whether the family may still proceed with permanent residence landing and thereafter submit an application for citizenship for the minor under subsection 5(2) of the Citizenship Act.
We understand that a minor 5(2) application requires the child to be a permanent resident and to otherwise meet the applicable requirements, and we would be grateful for confirmation as to whether that remains the appropriate pathway in this type of case.
This clarification is important because families may be preparing to travel to Canada for permanent residence landing, while there may now be a question as to whether the child should instead be treated as a Canadian citizen. If the matter is not clarified in advance, this could result in unnecessary delay, travel disruption, and avoidable expense.
We are raising this issue in a general manner for guidance purposes and would appreciate any direction on the appropriate process to follow in such situations.
Thank you for your time and consideration.

Best regards,