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November 24, 2014

Via email: Citizenship-Citoyennete@cic.gc.ca

Himmat Shinhat  
Director, Legislation and Program Policy  
Citizenship and Immigration Canada  
180 Kent Street, 6th Floor  
Ottawa, ON K1A 1L1

Dear Mr. Shinhat:

**Re: Notice requesting comments on a proposal to amend the Citizenship Regulations to implement certain provisions of the Citizenship Act, as amended by the Strengthening Canadian Citizenship Act**

I write on behalf of the National Immigration Law Section of the Canadian Bar Association (the CBA Section) about the “*Notice requesting comments on a proposal to amend the Citizenship Regulations to implement certain provisions of the Citizenship Act, as amended by the Strengthening Canadian Citizenship Act*” published in the Canada Gazette on November 15, 2014. The CBA is a national association of over 37,000 lawyers, notaries, students and law teachers, with a mandate to promote improvements in the law and the administration of justice. The CBA Section comprises lawyers whose practices embrace all aspects of immigration and refugee law.

The CBA Section appreciates the importance of public consultation in this area, and we have been actively engaged in the review of citizenship legislation for many years. The 10-day timeline for response does not permit meaningful consideration of the issues in a matter as fundamental to Canadian democracy as procedural fairness in revocation of citizenship by delegates of the Minister. We hope that an opportunity for proper consultation will be provided before any regulations are drafted or brought into force.

Yours truly,

*(original signed by Kerri Froc for Deanna L. Okun-Nachoff)*

Deanna L. Okun-Nachoff  
Chair, Immigration Law Section