

# Global Immigration alert

April 2026

## Canada

### New requirements for low wage Labour Market Impact Assessment applications

#### Executive summary

Effective 1 April 2026, Canada has implemented material changes affecting employers seeking Labour Market Impact Assessments (LMIAs) for low wage positions under the Temporary Foreign Worker Program (TFWP). The changes tighten minimum recruitment requirements by extending the mandatory advertising period and introducing a new obligation to demonstrate targeted outreach to youth. At the same time, the federal government has introduced time-limited, location-specific measures intended to support eligible rural employers by providing potential relief from the low wage positions cap. These developments increase the required lead time and documentation expectations for employers, while offering conditional flexibility in specific locations. Employers with ongoing or planned low wage hiring should reassess timelines and eligibility promptly.

#### Key developments

Minimum recruitment requirements for low wage LMIA applications have been updated as follows:

- Effective 1 April 2026, employers must advertise a low wage position for a minimum of eight consecutive weeks, compared with the prior four-week requirement. The advertising must occur within the three months before LMIA filing, and the full recruitment period must be completed before submission.
- Employers must now demonstrate targeted recruitment efforts aimed at youth. Current program materials indicate that “youth” generally refers to individuals aged 15 to 30, subject to further clarification through operational guidance. These recruitment activities are in addition to existing requirements to

advertise on the national Job Bank and to use supplementary recruitment methods.

- The updated recruitment obligations apply specifically to the low wage stream. High wage LMIA recruitment requirements remain unchanged.

Separately, the government has introduced temporary low wage measures intended to support certain rural employers:

- From 1 April 2026 to 31 March 2027, eligible employers located outside Census Metropolitan Areas (CMAs) in provinces and territories that formally confirm participation may benefit from increased flexibility in the low wage positions cap.
- For employers that meet all eligibility criteria, the cap on the proportion of temporary foreign workers in low wage positions may be increased to 15 percent of their workforce, instead of 10 percent.
- The measures apply only to new LMIA applications submitted during the effective period and only once provincial or territorial participation and criteria are confirmed.
- Currently, there are no changes to sector-specific variations or to positions that are exempt from caps. Low wage positions supported through permanent residence dual-intent streams remain excluded.

Additional program delivery instructions and confirmation of provincial and territorial participation are expected over the coming months.

## Impact on employers

The extended advertising period materially lengthens LMIA preparation timelines for low wage roles and may affect workforce continuity where temporary foreign workers are needed to meet operational demands. The new youth-focused recruitment expectation introduces an additional compliance dimension requiring careful and well-documented outreach efforts. While some market commentary has referenced heightened refusal risk, current federal guidance emphasizes demonstrable recruitment efforts rather than the introduction of new categorical eligibility bars.

For rural employers, the temporary cap flexibility could partially mitigate hiring constraints, but only where location, timing, and provincial or territorial participation requirements are satisfied.

## Key steps

Employers should:

- Identify all current and planned low wage LMIA applications and reassess recruitment timelines.
- Confirm whether worksites fall outside CMAs and monitor provincial or territorial confirmation of participation in the rural measures.
- Review recruitment practices to ensure youth-targeted outreach is incorporated and appropriately documented.
- Assess the impact of extended lead times on work authorization planning and workforce continuity.
- Ensure appropriate internal diligence is exercised to confirm that any prospective hires hold, or will hold, valid and sufficient work authorization for the relevant role.
- Track further guidance from federal and provincial authorities as implementation continues.

EY will continue to monitor these developments. Should you have any questions, we encourage you to contact one of our immigration professionals.

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