



The Honourable Marc Miller  
Minister of Immigration, Refugees and Citizenship Canada

[Marc.Miller@parl.gc.ca](mailto:Marc.Miller@parl.gc.ca)

September 14, 2023

**RE: Addressing the long-lasting issue brought forth by an ApplyBoard advertisement**

Dear Minister Miller:

Recently, our members brought to our attention an ApplyBoard advertisement, which reads, “ApplyBoard Students Are More Likely to Get a Study Permit Approval.” It seems to imply that ApplyBoard students may be treated favourably in their study permit applications.

The Canadian Association of Professional Immigration Consultants (CAPIC) has concerns over this type of advertisement. ApplyBoard is not an authorized representative in terms of Canadian immigration practice. It is not bound by the *Code of Professional Conduct for College of Immigration and Citizenship Consultants Licensees: SOR/2022-128* (the Code). While immigration and citizenship consultants (licensees) are bound by the Code that prohibits them from advertising as such pursuant to sections 44 and 45 of the Code, organizations such as ApplyBoard are not authorized to practice in immigration yet still ApplyBoard can freely post advertisements of this kind. The same applies to UAPs. Such practice puts immigration and citizenship consultants in a disadvantageous position compared to unauthorized organizations and UAPs, which counters the objectives of both the *Immigration and Refugee Protection Act, SC 2001, c. 27* (IRPA) and the *College of Immigration and Citizenship Consultants Act, SC 2019, c. 29, s. 292* (the College Act). Also, such advertisements may draw international students to unauthorized organizations without knowing that they are not protected if they retain those advertisers. There is no clarity from such advertisements in terms of who is responsible for an immigration file that may be routed through such organization. Is that person an authorized immigration consultant or student advisor, as authorized under the law?



Canadian Association of  
Professional Immigration Consultants  
L'Association Canadienne des  
Conseillers Professionnels en Immigration

To address this long-lasting issue, CAPIC recommends the Department initiate a plan to regulate international student recruitment agencies, i.e., only licensees of the College of Immigration and Citizenship Consultants are authorized to recruit international students. This will help enforce both the IRPA and the College Act. In addition, it is an effective measure to prevent international student exploitation by UAPs, an issue that has caused great [concerns](#), and has been troubling Canada's immigration system and the international student community.

Given the integrity of Canada's integrity system is such a high priority, we are confident the Department will take this matter seriously.

Sincerely,

Dory Jade, C. Dir.  
Chief Executive Officer  
CAPIC-ACCPI

Enclosures: Section 44(2) and 45, a copy of the ApplyBoard ad



## The College Act

### Section 44(2):

44(2) In marketing immigration or citizenship consulting services, a licensee must not

- (a) make false, misleading or inaccurate representations;
- (b) guarantee the success of an application, expression of interest or proceeding; or
- (c) imply that the licensee has a relationship with the Government of Canada or a provincial government.

### Section 45:

A licensee may use an endorsement by a client or former client in the marketing of their immigration or citizenship consulting services only if the endorsement

- (a) was actually given by a client or former client;
- (b) is true and accurate; and
- (c) has been reviewed and approved for public use by the client or former client in writing.



7:15



facebook



Like



Comment



Share



ApplyBoard

Sponsored ·



ApplyBoard Students Are 50% More Likely to Get a Canadian Study Per... See more



ApplyBoard Students are **50% More Likely to Get a Canadian Study Permit Approval**

PARTNER WITH US



FORM ON FACEBOOK

Partner and Grow with ApplyBoard

Sign Up

Grow 5X in 5 Years as a Recruitment Partner

192

15 comments 6 shares



Like



Comment



Share

