



9 July 2018

Hon. Roger Melanson, Minister  
Post-Secondary Education, Training and Labour  
Place 2000  
P. O. Box 6000  
Fredericton, NB E3B 5H1

VIA Email: [roger.melanson@gnb.ca](mailto:roger.melanson@gnb.ca)

**RE: Post Graduate-Work Permit - Private Career Colleges**

Dear Minister Melanson:

The Fredericton Chamber of Commerce would like to affirm its support of the New Brunswick Association of Private Colleges and Universities' position that post-graduate work permits be granted to private career colleges for international students.

It is our understanding that you verbally agreed to grant the post-graduate work permit to private colleges and in late April/early May and we are very keen to see this commitment come to fruition as soon as possible to align with the next post-secondary education recruiting cycle. It is a simple policy tweak that can have a substantive impact on some of New Brunswick's biggest issues by attracting and retaining more international students: an aging/stagnant population, the skills gap, and private-sector growth.

Private colleges and universities fill a specific need in New Brunswick's post-secondary education sector and as a trainer of the future workforce - giving them the tools needed to continue to fill these roles are critical. The Province of Quebec has made this policy change for all private institutions in their province - resulting in a clear competitive advantage for our neighbours. We have to level the playing field so that academia, government and business can work together to attract and retain as many international students as possible.

In fact, expanding work-experience opportunities for international students is a long-standing priority of the Fredericton chamber. In 2013, we started an initiative titled "Choose Fredericton" that aims to make connections between the local business community and the student population - this event has typically drawn a far higher percentage of international students.



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Similarly, the Fredericton chamber signed an MOU with the NB Student Alliance in 2017 that gives all of their members access to our free networking events, member-prices on ticketed events, and the opportunity to join our various committees.

In September 2017, we submitted a policy resolution at the Canadian Chamber of Commerce that called for more opportunities to work during their studies and a longer post-graduation job-search period. The full text of the resolution is reproduced below as “Appendix A.”

After our policy resolution was approved by 96% of delegates, it became part of the national chamber’s advocacy efforts. Later in the fall, we were informed that the language used in our recommendations may be interpreted as excluding private colleges, so we wrote to the Canadian chamber to clarify and ask that both private and public institutions be included in our advocacy - below as “Appendix B”. In 2018, we are re-submitting our resolution to remove any vagueness from our position - below as “Appendix C.”

As you can see, the business community is in full agreement with the New Brunswick Association of Private Colleges and Universities on this specific issue of post-graduate work permits and on the overall need to attract and retain more international students as part of the effort to stabilize our negatively-trending demographics and grow the province.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Krista Ross'.

Krista Ross, CEO  
Fredericton Chamber of Commerce

cc: Dale Ritchie, President, NB Association of Private Colleges and Universities

cc: Stuart Bentley, President, Eastern College



## Appendix A

### Attracting and Retaining International Students through Canadian Work Experience

#### Issue

Jurisdictions across Canada are searching for ways to attract and retain more international students. A significant impediment to these efforts are policies that make it more difficult for these students to obtain work experience while attending Canadian post-secondary institutions or immediately after graduation. These restrictions have both (a) legal ramifications: example: permanent residency / citizenship requirements; and (b) practical implications: example: connecting with the student's host community, making post-graduation career contacts, and gaining work experience - which employers are increasingly demanding from graduates.

#### Background

Canada needs to grow its population, lower its average age, and increase the number of skilled workers to fill key positions that enable business growth. Indeed, the latter has been a Canadian chamber priority for several years and is an issue in every province and territory. Per the chamber's 2015 Top 10 Barriers to Competitiveness: "Currently Canada is not producing enough graduates with the skills needed for its economy. Canada has shortages and high demand forecast in a wide range of occupations, from heavy equipment operators to information technology professionals, and its immigration policies are hindering employers' abilities to meet those needs in the short term."

Immigration has long been identified as a key component to present and future growth. This was borne out in the latest census data: Canada added approximately 1.7 million people between 2011 and 2016, with two-thirds of this increase attributable to immigration.

The timing of a renewed Canadian effort to become a destination of choice for international students may never be better. With nationalist sentiments emerging and anti-globalist governments assuming control in some of Canada's top competitors for international students, we are in a position to capitalize on the increasingly attractive quality of Canadian post-secondary education. Post-secondary institutions have recognized this opportunity and are redoubling their efforts to attract more international students to their schools. The Advisory Panel on Canada's International Education Strategy states "International students in Canada provide immediate and significant economic benefits to Canadians in every region of the country." The panel advocates for a doubling of the number of international students studying in Canada over the span of a decade, from just under 240,000 in 2011 to over 450,000 in 20223.

Bill C-6, An Act to amend the Citizenship Act and to make consequential amendments to another Act, which passed the Senate (with amendments) on 3 May 2017, will partially address some of the pertinent issues for international students, for example:

- International students will be able to count each day spent during their studies as a half day towards their permanent residency or citizenship requirements (up to a maximum of one year)



- Permanent residents will only have to be in Canada for 3 of the preceding 5 years to qualify for citizenship (down from 4 of 6).

Bill C-6 is a start, however, international students will still face significant barriers to working while attending a postsecondary institution and getting on a clear path to permanent residency. Some of the employment-based barriers faced by international students in Canada include:

- Ineligible for the Canada Summer Jobs program
- Co-op terms and internships require a separate work permit for international students
- After graduation, international students have only 90 days to find employment before requiring a cumbersome bridge extension study limit outside of Atlantic Canada
- Bill C-6 will count the time spent as an international student count towards citizenship eligibility at a rate of one half day for each full day of studies (previously this was zero)

International students are particularly desirable immigrants because of their age, skills and their economic impact (as students). Global Affairs Canada estimates that international students spent \$11.4 billion on tuition, accommodation and discretionary spending in 2014, creating almost 125,000 jobs across the country. At this time they represented about 9% of the college student population and 8.8% of the undergraduate student population in Canada - leaving room for significant growth.

That international students are allowed to work at all in the country is a relatively new development. Following a pilot program offering a work permit to international students at select institutions in Alberta, the Government of Canada formalized this work permit option in 2006. As a result, international students were allowed to work up to 20 hours per week while in-study and full-time during study breaks, such as winter or summer holidays. However, these rules only apply to full-time students; part-time international students are still ineligible to work in Canada.

The implications for business and the economy are clear. The country needs the next generation of consumers to sustain growth and the next generation of taxpayers to support our aging population. Businesses need skilled workers to innovate and grow. The 2015 Top 10 Barriers document reports that the persistent skills gap costs \$24 billion per year in Ontario alone. Increasing the number of international students at Canadian institutions represents an opportunity to address all of these concerns, but the employment restrictions detailed above are a barrier to fully realizing Canada's potential as a destination of choice.

## **Recommendations**

That the federal government:

1. Allow international students to qualify for the Canada Summer Jobs program.



2. Modify student permits to allow international students to participate in co-op terms and internships without obtaining a separate work permit.
3. Extend post-graduate job-search period from 90 days to 6 months, thereby eliminating the need for a 'bridge' extension study permit.
4. Count all time spent in Canada as an international student towards citizenship eligibility (i.e. increase from half time to full time).
5. Change the length of time for which a post-graduation work permit can be valid to five years (from the current three years), regardless of the program of study, so long as it was at a recognized Canadian academic institution.
6. Expedite the process for international students to receive visas as well as the processing times for their permanent residency applications so long as they graduated from a recognized Canadian institution and are currently employed within Canada.



**Appendix B**

23 November 2017

Jayson Myers  
Senior Vice President, Policy  
420-360 Albert Street  
Ottawa, ON K1R 7X7

Dear Mr Myers:

**Re: Clarification of Fredericton Chamber of Commerce’s 2017 Policy Resolution, “Attracting and Retaining International Students Through Canadian Work Experience”**

When our policy resolution titled “Attracting and Retaining International Students Through Canadian Work Experience” was passed by the delegates of the 2017 Canadian chamber conference in September 2017, we were unaware that the federal government does not consider graduates of some private institutions as eligible for post-graduation work permits. It was our intention that all public and private institutions would be covered by the language in our resolution that states “...any recognized Canadian academic institution...”

We have since been informed that the federal government would likely not interpret this language as covering private institutions, given that they are not currently eligible for post-graduation work permits. This letter is to clarify this point and request that any advocacy undertaken on this matter reflect our original intention that private institutions be included in the recommendations regarding post-graduation work permits.

To be clear, the recommendations should be understood to read:

5. Change the length of time for which a post-graduation work permit can be valid to five years (from the current three years), regardless of the program of study, so long as it was at a recognized Canadian academic institution, *including registered private institutions in all provinces that are registered on the Designated Institution list.*

6. Expedite the process for international students to receive visas as well as the processing times for the permanent residency applications so long as they graduated from a recognized Canadian institution, *including registered private institutions in all provinces that are registered on the Designated Institution list.*



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The situation is further convoluted as not all employees of the federal government apply this policy consistently - some graduates of private institutions have mistakenly been granted work permits due to the confusingly worded government policy, making it all the more important that the chamber is clear on its advocacy in this area.

Please feel free to reach out to me at anytime should you have questions or require further information.

Sincerely,

A handwritten signature in blue ink, appearing to read 'Krista Ross'.

Krista Ross, CEO  
Fredericton Chamber of Commerce

cc: Patrick Snider, Director, Skills and Immigration Policy, Canadian Chamber of Commerce  
cc: Brenda Johnson, CEO, Spruce Grove & District Chamber of Commerce  
cc: Penny Walsh McGuire, Executive Director, Charlottetown Chamber of Commerce  
cc: Samuel Titus, Acting Executive Director, New Brunswick Student Alliance  
cc: Stuart Bentley, President, Eastern College and triOS College



## APPENDIX C

### ATTRACTING AND RETAINING INTERNATIONAL STUDENTS THROUGH CANADIAN WORK EXPERIENCE

#### Issue

Jurisdictions across Canada are searching for ways to attract and retain more international students. A significant impediment to these efforts are policies that make it more difficult for these students to obtain work experience while attending Canadian post-secondary institutions. These restrictions have both (a) legal ramifications: example: permanent residency / citizenship requirements; and (b) practical implications: example: connecting with the student's host community, making post-graduation career contacts, and gaining work experience - which employers are increasingly demanding from graduates.

#### Background

Canada needs to grow its population, lower its average age, and increase the number of skilled workers to fill key positions that enable business growth. Indeed, the latter has been a Canadian chamber priority for several years and is an issue in every province and territory. Per the chamber's 2015 Top 10 Barriers to Competitiveness: "*Currently Canada is not producing enough graduates with the skills needed for its economy. Canada has shortages and high demand forecast in a wide range of occupations, from heavy equipment operators to information technology professionals, and its immigration policies are hindering employers' abilities to meet those needs in the short term.*"

Immigration has long been identified as a key component to present and future growth. This was borne out in the latest census data: Canada added approximately 1.7 million people between 2011 and 2016, with two-thirds of this increase attributable to immigration<sup>1</sup>.

The timing of a renewed Canadian effort to become a destination of choice for international students may never be better. With nationalist sentiments emerging and anti-globalist governments assuming control in some of Canada's top competitors for international students, we are in a position to capitalize on the increasingly attractive quality of Canadian post-secondary education. Post-secondary institutions have recognized this opportunity and are redoubling their efforts to attract more international students to their schools<sup>2</sup>. The Advisory Panel on Canada's International Education Strategy states "International students in Canada provide immediate and significant economic benefits to Canadians in every region of the country." The panel advocates for a doubling of the number of international students studying in Canada over the span of a decade, from just under 240,000 in 2011 to over 450,000 in 2022<sup>3</sup>.

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<sup>1</sup> <http://www.statcan.gc.ca/daily-quotidien/170208/dq170208a-eng.htm>

<sup>2</sup>

<https://www.theglobeandmail.com/news/national/education/international-admissions-to-canadian-universities-see-significant-increase/article34984977/>

<sup>3</sup> *Canada's International Education Strategy: Harnessing our Knowledge Advantage to Drive Innovation and Prosperity*. 2014. Accessed online:

<http://international.gc.ca/global-markets-marches-mondiaux/assets/pdfs/overview-aperçu-eng.pdf>



Bill C-6, *An Act to amend the Citizenship Act and to make consequential amendments to another Act*<sup>4</sup>, which passed the Senate (with amendments) on 3 May 2017, will partially address some of the pertinent issues for international students, for example:

- International students will be able to count each day spent during their studies as a half day towards their permanent residency or citizenship requirements (up to a maximum of one year)
- Permanent residents will only have to be in Canada for 3 of the preceding 5 years to qualify for citizenship (down from 4 of 6).

Bill C-6 is a start, however, international students will still face significant barriers to working while attending a post-secondary institution and getting on a clear path to permanent residency. Some of the employment-based barriers faced by international students in Canada include:

- Ineligible for the Canada Summer Jobs program
- Voluntary co-op terms and internships require a separate work permit for international students
- Bill C-6 will count the time spent as an international student count towards citizenship eligibility at a rate of one half day for each full day of studies (previously this was zero)

Further progress has been made in the past year as well. This resolution was initially passed in 2017 and a number of the recommendations have been fully or partially initiated by the federal government. The current version focuses on the recommendations that remain outstanding.

International students are particularly desirable immigrants because of their age, skills and their economic impact (as students). Global Affairs Canada estimates that international students spent \$11.4 billion on tuition, accommodation and discretionary spending in 2014, creating almost 125,000 jobs across the country<sup>5</sup>. At this time they represented about 9% of the college student population and 8.8% of the undergraduate student population in Canada - leaving room for significant growth<sup>6</sup>.

That international students are allowed to work at all in the country is a relatively new development. Following a pilot program offering a work permit to international students at select institutions in Alberta, the Government of Canada formalized this work permit option in 2006. As a result, international students were allowed to work up to 20 hours per week while in-study and full-time during study breaks, such as winter or summer holidays.<sup>7</sup> However, these rules only apply to full-time students; part-time international students are still ineligible to work in Canada.

The implications for business and the economy are clear. The country needs the next generation of consumers to sustain growth and the next generation of taxpayers to support our aging population. Businesses need skilled workers to innovate and grow. The 2015 Top 10 Barriers document reports that the persistent skills gap costs \$24 billion per year in Ontario alone. Increasing the number of

<sup>4</sup> <https://openparliament.ca/bills/42-1/C-6/?tab=mentions>

<sup>5</sup> <http://www.international.gc.ca/education/report-rapport/impact-2016/index.aspx?lang=eng>

<sup>6</sup> *International students in tertiary education and distribution of international enrolments, by level of tertiary education, Canada and provinces, 2014* (Ottawa: Statistics Canada, 2014).

<http://www.statcan.gc.ca/pub/81-604-x/2016001/t/tblc1.1-eng.htm>

<sup>7</sup> Citizenship and Immigration Canada, *Backgrounder – Off-Campus work permit program*. September 12, 2007. Accessed online: <http://www.cic.gc.ca/english/departement/media/backgrounders/2007/2007-09-12.asp>

<sup>8</sup> Government of Canada (Immigration and Citizenship), *Work off campus*. February 3, 2015. Accessed online: <http://www.cic.gc.ca/english/study/work-offcampus.asp>



international students at Canadian institutions represents an opportunity to address all of these concerns, but the employment restrictions detailed above are a barrier to fully realizing Canada's potential as a destination of choice.

### **Recommendations**

That the federal government:

1. Allow international students attending either a public institution, or private institution in any province or territory, that is registered on the Designated Institution list, to qualify for the Canada Summer Jobs program.
2. Allow international students attending either a public institution, or private institution in any province or territory, that is registered on the Designated Institution list, to participate in voluntary co-op terms and internships without obtaining a separate work permit.
3. Allow international students attending either a public institution, or private institution in any province or territory, that is registered on the Designated Institution list, to count all time spent in Canada as an international student towards citizenship eligibility (i.e. increase from half time to full time).

### **SUBMITTED BY THE FREDERICTON CHAMBER OF COMMERCE**

**Co-SPONSORED BY THE SPRUCE GROVE CHAMBER OF COMMERCE, THE GREATER CHARLOTTETOWN CHAMBER OF COMMERCE AND THE ST. JOHN'S CHAMBER OF COMMERCE**