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From:
Mail received time: Sun, 30 Mar 2025 18:10:41
Sent: Sun, 30 Mar 2025 14:09:58
To: Immigration Representatives / Représentants immigration (IRCC)
Subject: Place of application for study permit and work permit applications
Importance: Normal
Sensitivity: None
Attachments:
PGWP.png;

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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.

[redacted]

I am writing to seek clarification regarding the interpretation of the "place of application" as referenced in:

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  Sections **R197 to R199** of the Immigration and Refugee Protection Regulations (IRPR) concerning work permits, and

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  Sections **R213 to R215** of the IRPR concerning study permits.

Could you please confirm whether the "place of application" mentioned in these regulations is equivalent to the physical location of the applicant at the time of submitting the application?

For instance, would an applicant be eligible to apply online for a work permit under R197 (outside Canada) while physically located in Canada?

Similar instructions (screenshot attached) can be found in the operational instructions regarding post-graduation work permit that:

An applicant may electronically submit an application under R197 (outside Canada) while they physically remain in Canada.

Additionally, I would appreciate clarification regarding the terminology used on IRCC's website, specifically the phrases:

- *

  "Apply from outside Canada" and

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  "Apply from inside Canada"

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as referenced in the "How to Apply" sections for both study permits and work permits.

Could you clarify whether these terms refer to the applicant's **physical location** (i.e., being physically inside or outside Canada) at the time of application submission? Alternatively, do these terms correlate with the applicable regulations — where "outside" corresponds to R213 (study permits) and R197 (work permits), and "inside" corresponds to R215 (study permits) and R199 (work permits)?

Thank you in advance for your time and assistance. I look forward to your guidance on this matter.

Regards,

Regulated Canadian Immigration Consultant

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Note: An applicant may electronically submit an application under section R197 (outside Canada) while they physically remain in [redacted] their status [redacted] receive the actual work permit. However, they are **not eligible** to work, in accordance with paragraph R186(w), while waiting for a decision on their PGWP application. In addition, after receiving provisional approval, they will have to leave and re-enter Canada to be examined and issued any provisionally approved work permit.