

**IN THE MATTER OF *THE INTERNATIONAL CREDENTIALS RECOGNITION ACT***

**S.B.C 2023, c.39 [The Act]**

**IN THE MATTER OF A REQUEST FOR AN EXEMPTION PURSUANT TO SECTION 21(1)(a) of  
the Act**

**By**

**The Society of Notaries Public of British Columbia**

**From the**

**PROHIBITION ON CANADIAN WORK EXPERIENCE REQUIREMENTS**

**DECISION UNDER SECTION 23(1)**

**WHEREAS:**

- A. Section 16 of the *International Credentials Recognition Act* prohibits regulatory authorities from imposing a requirement for Canadian work experience on internationally trained applicants who meet section 4(3) of the *International Credentials Recognition Regulation (ICRR)*.
- B. Section 4(2) of the ICRR lists prohibited Canadian work experience requirements for internationally trained applicants who meet the criteria listed in section 4(3) of the *ICRR*.
- C. Section 21 of the Act provides the Superintendent of International Credential Recognition the authority to grant an exemption to a regulatory authority from the prohibition on the Canadian work experience requirement.
- D. The Society of Notaries Public of British Columbia (SNPBC) regulates the profession of Notaries Public in the public interest by setting standards and investigating complaints. The SNPBC offers the Notary Education Program which includes a 6-week (250 hour) mentoring requirement.
- E. The SNPBC made an application for an exemption from the prohibition on Canadian work experience requirements for internationally trained applicants on April 23, 2025.

F. The Office for International Credential Recognition evaluated the application for an exemption in accordance with the criteria in section 5 of the ICRR. From the evidence presented by SNPBC it appears that:

- a. Assessment of the competencies of an internationally trained applicant is consistent with section 12(b) of the Act as the competencies relate to the safety, health and welfare of the public and consumers in the following ways:
  - i. The competencies identified by SNPBC protect consumers from legal issues, financial loss, business fraud, and misrepresentation.
- b. SNPBC did not submit satisfactory evidence to show that the only way to assess the competencies is through Canadian work experience or that other methods are insufficient.
- c. An alternative means to Canadian work experience does not exist to acquire a competency
  - i. The scope of practice of Notaries in BC is unique. The competencies require a level of application and administration, necessitating direct exposure to the legal context within BC.
- d. A requirement for Canadian work experience to assess whether an internationally trained applicant has the competencies is proportionate to the risk of harm to the public, the environment, animal or plant life or health or consumers if the competencies were not assessed or assessed by a means other than with Canadian work experience.
  - i. The 6-week mentorship requirement is justified by the level of financial and legal risk associated with failing to properly assess the competencies.
- e. Other information considered was:
  - i. The relatively short length of mentorship.
  - ii. The fact that the mentorship requirement is nestled within the Notary Education Program and individuals have access to SNPBC's existing network of approved mentors.
  - iii. The mentorship requirement is not imposed only on internationally trained applicants - given the uniqueness of the scope of practice, Notaries from other provinces are required to complete the Notary Education Program and mentorship requirement.

NOW THEREFORE,

Pursuant to section 23(1) of the Act:

1. The SNPBC is granted an exemption in respect of the following Canadian work experience requirement:
  - a. 6 weeks (250 hours) of the mentorship requirement during the Notary Education Program.
2. The exemption is effective as of July 1, 2025.



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Kate Haines  
Superintendent of International Credential Recognition  
Office for International Credential Recognition

Date: June 30, 2025