



From the office of the Chief Executive Officer / Du cabinet du chef de la direction

10 July 2024

Trade Policy and Negotiations Division  
Global Affairs Canada  
111 Sussex Drive  
Ottawa ON K1A 0G2  
Via E-mail (cptpp-ptpgp.consultations@international.gc.ca)

**Re: Comprehensive and Progressive Agreement for Trans-Pacific Partnership**

To Global Affairs Canada:

Thank you for the opportunity to provide comments for the public consultations on the General Review of the Comprehensive and Progressive Agreement for Trans-Pacific Partnership (CPTPP).

Engineers Canada is the national organization of the 12 provincial and territorial associations that regulate the practice of engineering in Canada and that license the country's more than 300,000 members of the engineering profession. Engineering is a regulated profession in Canada with engineering regulators established through acts of the provinces and territories.

Engineers Canada exists to support the provincial and territorial engineering regulators in advancing engineering through national collaboration. We are the only national voice of the engineering profession. Together, we work to ensure an ethical, competent, equitable, and growing engineering profession in the public interest.

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Engineering is critical to Canada's national prosperity, both as a profession and as a service export. Canada is one of the top five exporters of engineering services worldwide. Engineering is one of Canada's top five service exports to CPTPP countries.

The CPTPP, like other free trade agreements Canada has negotiated, contains several important measures of the international mobility of licensed professionals, including engineers. Engineers Canada supports Canada's preferred approach to incorporating these concerns into free trade agreements, and offers the following recommendations for the CPTPP review:


1. As Canada and its trading partners have agreed, the recognition of qualifications, permanent/temporary licensing, and negotiation of mutual recognition agreements (MRAs) are the purview of provincial and territorial governments. Each province and territory has enacted legislation establishing independent engineering regulators that uphold the highest standards for the profession and are responsible for credential recognition.
2. Provisions pertaining to mutual recognition, including temporary licensing for foreign professionals, should provide a transparent framework to facilitate the voluntary negotiation of MRAs. The current Professional Services Annex (Annex 10-A) to the CPTPP provides a robust framework for negotiating MRAs and should be preserved in its current state.
3. Annex 10-A contains language recognizing the important work of the Asia-Pacific Economic Cooperation (APEC) agreement in promoting mutual recognition of professional competence in engineering, including international mobility.
4. Annex 10-A also provides a framework for the temporary and project-specific licensure or registration of engineers in consultation with the relevant professional bodies.
5. As in other free trade agreements, CPTPP establishes a Professional Services Working Group to facilitate international mobility according to the frameworks laid out in Annex 10-A.

Engineers Canada asks that the Government of Canada continue to pursue this approach to international mobility and preserve the existing frameworks negotiated in CPTPP.

While the international mobility of engineers is important to leverage the benefits of globalization for Canada's economy, it is also essential that licensure and the regulation of engineers operate effectively to maintain the high ethics, qualifications, and practice standards that define the engineering profession in Canada. The public must continue to trust that engineers, regardless of where they were trained, have the right education and skills to practise engineering in Canada with competence and integrity.

We thank Global Affairs Canada for the opportunity to provide feedback and we look forward to continued discussion on this important initiative. Should you have any questions or wish to discuss the issue further, representatives from our organization would be happy to speak with you. Please reach out to Nathan Durham, Manager of Public Affairs at +1 613-232-2474 ext. 265 or [nathan.durham@engineerscanada.ca](mailto:nathan.durham@engineerscanada.ca).

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerard McDonald". The signature is fluid and cursive, with a large initial "G" and "M".

Gerard McDonald, MBA, P.Eng., ICD.D.  
Chief Executive Officer, Engineers Canada

cc: Jeanette M. Southwood, FCAE, FEC, LL.D. (h.c.), P.Eng., Vice President, Corporate Affairs and Strategic Partnerships  
Nathan Durham, Manager, Public Affairs, Engineers Canada