

March 15, 2022

Ms. Katerina Koperna
Manager, Technical Committee Operations
American Society for Testing Materials (ASTM) International
kkoperna@astm.org

Dear Ms. Koperna:

Re: Proposed change to the definition of “engineer” in ASTM F2783

We wanted to inform you of a concern we have regarding the proposed changes to the Canadian Standard of the American Society for Testing Materials (ASTM) F2783, specifically [ASTM F2783-20 - Standard Practice for Design, Manufacture, Operation, Maintenance, and Inspection of Amusement Rides and Devices, in Canada](#), as it relates to the definition of engineer.

Engineers Canada is the national organization that represents the 12 provincial and territorial engineering regulators that license the more than 300,000 members of the engineering profession in Canada. As the only national voice for the engineering profession, our organization has a long-standing history of working and collaborating with the federal government to help inform and develop legislation, regulations, and policies.

Currently, the “engineer” definition listed as part of section 3.3 of the ASTM F2783-20 states that “3.3 engineer, n—an engineer as defined by and licensed in accordance with the applicable provincial or territorial statute.” It has come to our attention that the proposed change would result in the definition being updated to state “3.3 engineer, n—an engineer as defined in accordance with the applicable local statutes or by the AHJ”. While we understand the desire to harmonize the Canadian version of the code with the US version, we have great concerns regarding this proposed change of definition.

In Canada, the terms “professional engineer” and “engineer” are restricted by provincial law. The terms refer to an individual who holds a license with a provincial or territorial [engineering regulator](#). Similar to the medical and legal professions, engineers in Canada are licensed to be held accountable in the provinces or territories in which their engineering work is being conducted.

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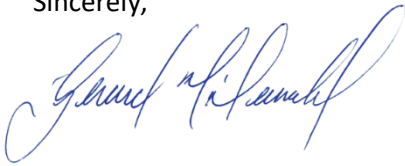
By removing the specific clause “as defined by and licensed in accordance with the applicable provincial and territorial statute” as part of the definition, the standard may be putting the safety of Canadians at risk by failing to comply with provincial and territorial acts and licensing requirements for engineering work.

Engineering legislation in all provinces and territories provide engineering regulators with the clear and exclusive mandate to regulate the practice of engineering in the public interest. Engineers Canada strongly believes that the public interest is best served and protected when engineering work is conducted by an engineer who is licensed in the province or territory where that work is being completed. Professional engineers are held publicly accountable for their work. These layers of accountability and transparency help keep Canadians safe.

We wanted to inform you of our concern in the hopes that ASTM International would ensure that the original “engineer” definition remains unchanged. We would be happy to discuss our concerns directly with you. To schedule a meeting, please contact Joey Taylor, Manager, Public Affairs, at 613-232-2474 x213, or at joey.taylor@engineerscanada.ca.

We look forward to hearing from you.

Sincerely,

A handwritten signature in blue ink, appearing to read "Gerard McDonald".

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

CC: Stephanie Price, FEC, P.Eng., CAE, Executive Vice President, Regulatory Affairs
Jeanette Southwood, FCAE, FEC, LL.D. (h.c.), P.Eng., IntPE, Vice-President, Corporate Affairs and Strategic Partnerships
Joey Taylor, M.Sc., PMP, Manager, Public Affairs