



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

June 8, 2023

The Honourable Jonathan Wilkinson, P.C., M.P.
Minister of Natural Resources
House of Commons
Ottawa, Ontario K1A 0A6

Dear Minister:

Thank you for the opportunity to comment on *Bill C-49, An Act to amend the Canada–Newfoundland and Labrador Atlantic Accord Implementation Act and the Canada-Nova Scotia Offshore Petroleum Resources Accord Implementation Act and to make consequential amendments to other Acts*. While we acknowledge the amendments proposed in the Bill that aim to expedite the development of offshore wind projects on Canada's East Coast and align with regional assessments, promote marine conservation, and fulfill Canada's commitments for a reliable and clean power supply, we would like to emphasize the crucial importance of incorporating enhanced language within Bill C-49 to ensure better protection of the public in offshore engineering work.

Engineers Canada represents the 12 provincial and territorial engineering regulators in Canada, which collectively license the more than 300,000 members of the engineering profession. As the only national voice for the engineering profession, we have a history of collaborating with the federal government to inform and develop legislation, regulations, and policies.

The current regulatory framework governing offshore oil and gas activities in Canada falls short in adequately addressing the regulation of offshore engineering work, that includes offshore wind development. Currently, infrastructure outside Canadian jurisdiction lacks the same level of Canadian engineering regulation as onshore projects, which are subject to regulation by provincial or territorial engineering regulators. This regulatory gap poses risks to public safety and environmental protection.

To address these concerns, the federal government must collaborate closely with engineering regulators and develop improved regulations for engineering activities performed outside provincial jurisdiction but within federal control, encompassing both offshore engineering work, which includes wind development. This collaboration would ensure that offshore engineering work is subject to the same level of regulation as onshore projects, ultimately serving the public interest by guaranteeing worker safety and upholding high professional and ethical standards.

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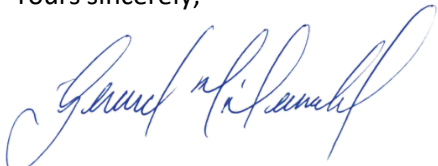
Provincial and territorial engineering regulators have already taken significant steps to address this issue. Notably, Professional Engineers and Geoscientists Newfoundland & Labrador (PEGNL) has published [Practice Guidelines for Authenticating Professional Documents](#) related to offshore drilling. These guidelines establish stringent protocols that promote adherence to professional standards, serving as an example of proactive measures taken by regulators to address the challenges associated with offshore engineering activities.

To ensure consistent regulation and protection of the public interest, we recommend that Bill C-49 incorporates a requirement for engineers to be licensed by the respective provincial or territorial regulator overseeing the offshore engineering work. Engineers from all disciplines play a critical role in the exploration, discovery, testing, and distribution of offshore wind energy. Additionally, we urge the federal government to maintain its collaboration with engineering regulators to further develop and strengthen regulations for activities involving engineering components that take place outside provincial and territorial jurisdiction but fall under federal control. This ongoing collaboration will establish comprehensive and robust regulations that effectively address the unique challenges and risks associated with offshore engineering work, promoting public safety and upholding professional and ethical standards.

Minister Wilkinson, the engineering profession stands ready and committed to sharing its unbiased expertise with the federal government. We look forward to ongoing discussions on this initiative and welcome any opportunity to provide further input. If you have any questions or wish to discuss the matter further, our organization's representatives would be delighted to speak with you. For more information or to schedule a meeting, please contact Joey Taylor, Manager of Public Affairs and Government Relations, at 613-232-2474 ext. 213 or at joey.taylor@engineerscanada.ca.

Thank you for your attention to this matter. We remain committed to ensuring the highest standards of engineering practice and protecting the public interest in offshore engineering work.

Yours sincerely,



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