



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

August 31, 2021

The People-Centred Just Transition Discussion Paper  
Natural Resources Canada  
580 Booth Street  
Ottawa, ON K1A 0E4  
[nrcan.justtransition-transitionequitable.nrcan@canada.ca](mailto:nrcan.justtransition-transitionequitable.nrcan@canada.ca)

To whom it may concern:

**Re: Engineers Canada's comments on Natural Resources Canada's "People-Centred Just Transition Discussion Paper"**

Thank you for the opportunity to provide comments regarding Natural Resources Canada's [People-Centred Just Transition Discussion Paper](#) and the newly proposed just transition legislation.

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 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.

Climate change and extreme weather events continue to pose a significant threat to public safety, the natural environment, the reliability of vulnerable infrastructure, and the economy. Engineers Canada is encouraged to see the Government of Canada's diverse climate action commitments. Particularly, its assurances to put Canada on the path towards meeting the temperature goals of the Paris Agreement by 2050, its efforts to strengthen Canada's climate plan through [A Healthy Environment and a Healthy Economy](#), its work in 2020 to introduce the [Canadian Net-Zero Emissions Accountability Act](#), and now, its focus on ensuring that steps towards a low-carbon economy in Canada remain just, equitable, and focused on equity-deserving workers and their communities.

.../2

Engineers Canada is supportive of the four principles that are outlined in Natural Resources Canada's *People-Centred Just Transition Discussion Paper*. However, we strongly believe that building on the resilience of Canada's workforce so that it is well-equipped with the skills that are required to deliver on Canada's ambitious climate transition initiatives, requires the unbiased expertise, determination, and ingenuity of the engineering profession. The concept of a just and equitable transition towards a low-carbon economy not only encompasses a people-centred approach, but it includes other aspects of potential harm that are raised by the prospect of broad-scale structural transitions, such as the wider impact to public safety and the potential impacts of climate change on communities. This concept draws on a range of perspectives that share the common theme to properly consider and manage issues associated with structural change.<sup>1</sup>

It is paramount that the federal government identify and anticipate the skills that are required for a successful structural change. Scaling up the use of green technologies, for example, requires individuals with the right set of technical skills to adapt them, and to transfer that knowledge successfully to users. The technical skills, transferable knowledge, and accountability held by engineers in Canada will be key in managing large-scale structural changes associated with a just transition to a low-carbon economy. Accelerated climate change presents new and evolving challenges, opportunities, and risks that are considered by engineers in the fulfillment of their professional responsibilities.

Engineers provide high-value work that is designed to support regional circumstances, as well as the differing needs of communities across Canada. This clearly supports the second proposed principle in the government's discussion paper that states: "policies and programs in support of a people-centred, just transition must create decent, fair and high-value work designed in line with regional circumstances and recognizing the differing needs, strengths, and potential of communities and workers."<sup>2</sup> Additionally, Engineers Canada, alongside the engineering regulators, are committed to raising awareness around the continued releases of GHG emissions and the potential impacts of the changing climate as they relate to the engineering practice. This is set out in Engineers Canada's [Public Guideline: Principles of climate adaptation and mitigation for engineers](#).<sup>3</sup> The commitment is to provide information and assistance to engineers in managing implications for their own professional practice. Engineers also have the ethical responsibility to uphold public safety and the natural environment as paramount in their daily practice, placing people and the public interest at the forefront of their practice.

For these reasons, Engineers Canada recommends the following:

.../3

---

<sup>1</sup> Stockholm Environment Institute (2020). "Seven principles to realize a just transition to a low-carbon economy." Retrieved August 6, 2021, from: <https://cdn.sei.org/wp-content/uploads/2020/06/seven-principles-for-a-just-transition.pdf>.

<sup>2</sup> Government of Canada (2021). "People-Centred Just Transition: Discussion Paper." Retrieved August 1, 2021 from: [https://www.rncanengagenrcan.ca/sites/default/files/pictures/home/just\\_transition\\_discussion\\_paper\\_en\\_-\\_july\\_15.pdf](https://www.rncanengagenrcan.ca/sites/default/files/pictures/home/just_transition_discussion_paper_en_-_july_15.pdf).

<sup>3</sup> Engineers Canada (2018). "Public Guideline: Principles of climate adaptation and mitigation for engineers." Retrieved August 7, 2021 from: [public\\_guideline\\_principles\\_of\\_climate\\_adaptation\\_and\\_mitigation\\_for\\_engineers\(8\).pdf](#).

1. That the engineering profession be included as a key stakeholder in the development and implementation of projects and initiatives under Canada's newly proposed just transition legislation. Our organization believes that adequate, informed, and ongoing dialogue with the right practitioners builds a strong social consensus around the goals and pathways that are required to achieve a low-carbon and a just economy.
2. That a professional engineer be a member of the proposed *Just Transition Advisory Board* to provide independent, unbiased, and expert technical advice to the government on regional and sectoral transition strategies that work to uphold public safety, the natural environment, and the economy.

To build on the agility and resilience of Canada's workforce so that it is equipped with the range of skills and innovative thinking that is required to support this ambitious transition, the workforce must be inclusive by design. Addressing existing barriers and creating opportunities for traditionally marginalized groups across Canadian industries, specifically within the engineering profession, will be key to ensuring that people remain at the centre of Canada's transition to a low-carbon economy. The engineering profession understands the importance of leveraging the best talent from all parts of society to increase innovative outputs, to systemically assess the potential impacts of climate change action on workers and their communities, and to build a strong social consensus that is representative of the diverse needs of Canadian communities on the goals and pathways towards achieving net zero.

Engineers Canada is actively working to support the recruitment, retention, and professional development of women and Indigenous people in the engineering profession, primarily through our [30 by 30 initiative](#) and our work alongside post-secondary institutions to support [Indigenous people's access to post-secondary engineering education](#). In addition, Engineers Canada's Board voted to join the federal government's [50-30 Challenge](#). Having diverse experiences and voices at the table helps to deliver a coherent guide for programs and projects to systemically assess the potential impacts of climate change and low-carbon transitioning on workers and their communities; a key facet that supports the principles of this discussion paper.

The federal government's willingness to coordinate and collaborate with key stakeholders, particularly the engineering profession, is essential to supporting a just transition to a low-carbon economy, all while upholding the public interest and Canada's natural environment. We look forward to working with the government to contribute towards these efforts.

We thank you for the opportunity to provide comments on this important federal initiative.

Sincerely,



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

CC: 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