



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

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The Offshore Renewable Energy Regulations Initiative
Natural Resources Canada
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To whom it may concern:

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. We welcome the opportunity to provide comments to the discussion paper regarding [Canada's Approach to Offshore Renewable Energy Regulations](#).

Engineers Canada is supportive of the five guiding principles proposed in the offshore renewable energy regulations (ORER). To ensure that the guiding principles make sense for developing safety and environmental protection requirements for offshore renewable energy (ORE) projects, it is in the public's interest that licensed engineers be incorporated in the review of all proposed ORE projects as well as oversee these facilities throughout their lifecycle.

Engineers from all disciplines are integral to offshore oil and gas exploration, discovery, testing, extraction, and distribution initiatives and activities. Taking into consideration the level of risk that is posed to the natural environment when offshore renewable energy projects are considered, it is Engineers Canada's view that individuals performing assessments for designated projects under the [Canadian Energy Regulator Act](#) should do so with high levels of technical skills and ethics, and should be held professionally accountable for their actions. The self-regulation of the engineering profession ensures that engineers are held to high professional and ethical standards, all while establishing a precedent that public safety is paramount in their practice. By providing a direct reference in the ORER for licensed engineers in Canada to be consulted on all projects, ensures that offshore initiatives

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and activities are conducted by individuals who are accountable to high professional and ethical standards by regulatory mechanisms that require them to work in the public interest, which in turn strengthens the OREER guiding principles. Engineers Canada therefore proposes that an additional principle be drafted that requires a professional engineer to be involved.

In addition, Engineers Canada also believes that the proposed five key components for the regulations that include requirements for project proponents to meet based on the type of activity proposed are a good start, however these need to be elaborated to require that activities and projects be authenticated by an engineer licensed by a Canadian engineering regulator

The design of project components with respect to structural integrity, personnel safety, and environmental protection, as well as the fabrication, transportation, installation, and commissioning of offshore project components, requires professional oversight and strong regulations. Specifically, in section 5 – *Key Components of The Proposed Offshore Renewable Energy Regulations*, it is in the public interest that all infrastructure, components, and devices be subject to Canadian engineering regulatory oversight.

Infrastructure that is built or designed in Canada is subject to regulations by the provincial or territorial engineering regulator for that given jurisdiction. Yet as it currently stands, infrastructure to be used offshore that is designed and built outside of Canadian limits is not subject to those same Canadian engineering regulations. We believe that it is in the public interest that all infrastructure designed, built, or used within Canada—including in its offshore areas—must be regulated in a manner similar to that which is currently done by the provincial and territorial engineering regulators for engineering work on land.

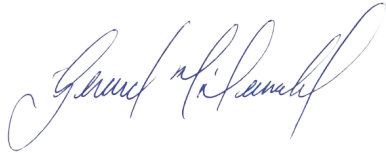
To provide oversight and accountability to the design, fabrication and construction of offshore requirements outlined in section 5 of the document, it is imperative that the assembly, incorporation, testing and commissioning of activities and projects be authenticated by an engineer licensed by a Canadian engineering regulator. This applies to all parts of the offshore project including wind, wave, current, or tidal generation devices, the substructures and foundations, the electrical service platforms, the inter-array and export cables, and any other permanently installed auxiliary structures.

The federal government’s willingness to coordinate and collaborate with key stakeholders, particularly the engineering profession, is essential in supporting initiatives and regulations, all while upholding the public interest and Canada’s natural environment. We look forward to working with the government to contribute towards these efforts.

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

Sincerely,

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

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

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