



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

June 27, 2022

Let's Talk Federal Regulations Initiative
Treasury Board of Canada Secretariat
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To whom it may concern:

We are writing to you today to provide comments to the Treasury Board of Canada Secretariat (TBS) [Let's Talk Federal Regulations](#) initiative as it pertains to [Breaking down inter-jurisdictional regulatory barriers](#). We are interested in sharing our thoughts regarding the opportunities to align and cooperate on regulations with other governments on regulatory barriers impeding trade.

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.

Despite the increasing globalization of markets, it can be harder to move goods and services across provincial and territorial boundaries within Canada than across international borders, damaging Canada's domestic markets and its competitive position in the global market. Engineers Canada has long recognized the importance of interprovincial and interterritorial labour mobility to ease internal trade barriers and ensure that engineers can best serve Canada and protect the public. The mobility of professionals is important for career advancement and to ensure that engineering skills and knowledge are available where they are needed throughout the country. To perform engineering work in Canada, engineers must be licensed in the province or territory where the work is being completed. Recognizing the mobility of engineers across Canada as many share their expertise on projects in other provinces, the engineering regulators have worked tirelessly to facilitate seamless movement of professionals from one province or territory to another. These arrangements have resulted in one of the most straightforward interprovincial and interterritorial systems among the regulated professions in Canada.

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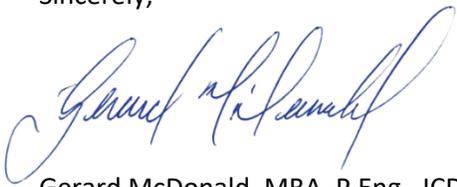
Indeed, the engineering profession has been recognized by the federal government as having one of the most advanced internal regimes in Canada. In 1999, Engineers Canada and the engineering regulators signed the Inter-Association Mobility Agreement, which was renewed in 2004, that allows engineers who are licensed in one jurisdiction in Canada to register in another province or territory with minimal administrative requirements and processing delays. The final decision for licensing remains at the discretion of the issuing regulator. The Canadian Free Trade Agreement (CFTA) entered into effect on July 1, 2017, replacing the Agreement on Internal Trade (AIT). The CFTA incorporates all AIT elements requiring that workers in regulated professions be able to work anywhere in Canada without undergoing additional training, assessments, or examinations. More specifically, Chapter 7 of the CFTA titled "Labour Mobility," seeks to eliminate or reduce measures to restrict or impair mobility, provided that the requirements are similar to those imposed in another jurisdiction or region in Canada. As a result of these initiatives, the vast majority of individuals secure a licence efficiently and with little delay as a result of mobility agreements already in place.

To reduce, and to ultimately eliminate, barriers to labour mobility, the federal government should consult and collaborate with the engineering profession to achieve the desired outcomes for professional mobility within Canada. The ongoing efforts of the engineering regulators have been recognized by the federal government as a leading example of work being conducted to improve labour mobility across the country.

Engineers Canada and the engineering regulators play a leadership role in addressing several challenging mobility issues by actively engaging government officials and have fully supported agreements that enhance maximum mobility between provinces and territories. We look forward to our continued partnership with the federal government to contribute towards these efforts.

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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