



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

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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 in order to help inform and develop legislation, regulations, and policies. While we understand the federal and provincial complexities of dealing with wastewater systems effluent, we welcome the opportunity to provide input on amendments to the [Wastewater Systems Effluent Regulations \(WSER\)](#), in particular on transitional and temporary authorizations.

From protecting economic assets by ensuring wastewater systems and physical infrastructure are sound, to the development of new innovations to solve complex problems, the Canadian public depends greatly on the unbiased expertise of the engineering profession. Taking into consideration the level of risk that is posed to the natural environment when wastewater systems and existing infrastructure do not meet effluent quality standards, it is Engineers Canada's view that individuals performing assessments for designated projects under the [WSER](#) should do so with high levels of technical skills and ethics, and should be held professionally accountable for their actions.

Currently, sections 7(4) and 34(4) of the [WSER](#) delineate that methods of estimation are based on generally accepted "engineering practices;" however, consistent standards for engineering practices are not defined in the regulations. Incorporating the accountability of a professional engineer into the regulations weaves the engineering regulatory process into the fabric of government and works to keep Canadians and the environment safe.

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In addition to *WSER*, provinces have regulations which govern wastewater discharges to ground and surface waters (e.g. B.C. Reg. 87/2012) and impose more stringent requirements on a province-wide or site-specific basis. While both regulations apply, the more stringent requirements of the two are typically applied rendering provincial standards to take precedence in many instances. To address this and other issues, development of professional standards of practice in collaboration with Engineers Canada and provincial engineering regulatory bodies could support *WSER* implementation and help accomplish multiple goals, including:

- delineating the activities under *WSER* that require the application of professional engineering,
- identifying when engineers may need to be engaged for effluent monitoring and temporary bypass authorizations to protect the public interest and environment,
- streamlining planning for upgrades to wastewater treatment plants targeting the 2030/40 horizon while considering implications for priority issues like greenhouse gas emissions and watershed-level wastewater management, and
- creating communities of practice and opportunities to provide professional development for engineers in this area.

Given the unique perspectives of professional engineers, Engineers Canada recommends the following to improve upon and strengthen the [\*WSER\*](#):

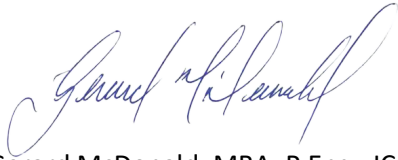
1. That the regulations be expanded to include that all wastewater systems work—including, but not limited to, transitional and temporary authorization—must be done in accordance with sound engineering principles.
2. That all engineering work relating to wastewater systems must be approved by a professional engineer.
3. That consideration be given to the development of national professional standards of practice to support *WSER* implementation.

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

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

Sincerely,



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Chief Executive Officer

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