



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

July 22, 2019

Public Services and Procurement Canada
350 King Edward Avenue
Ottawa, Ontario
K1A 0X1

Re: Engineers Canada's position on Phase 1 of the Practitioner's Guide for Procurement Pricing

To whom it may concern,

Thank you for the opportunity to provide comments on Phase 1 of Public Services and Procurement Canada's [*Practitioner's Guide for Procurement Pricing*](#). Currently, the Guide is intended to inform those involved in Government of Canada contracting of the required steps and factors to be considered in making procurement pricing decisions, including aligning the pricing with the overall procurement strategy, objectives, and priorities.

Engineers Canada is the national organization of the 12 provincial and territorial associations that regulate the practice of engineering in Canada and license the country's 295,000 professional engineers. Engineering is a regulated profession in Canada with engineering regulators being established through Acts of the provinces and territories. Engineers Canada exists to support these provincial and territorial engineering regulators, especially in coordinating their activities with the federal government. Together, we work to advance the profession in the public interest.

It is important that the Federal Government in its activities recognizes that the public of Canada is best served when engineering "professional judgement" is made by those appropriately licensed by the provincial and territorial regulators. This fundamental principle should be recognized by the federal government in its legislation and associated documents, ensuring even though the regulation of engineering practitioners is provincial legislation, that federal legislation and the people of Canada benefit from that provincial legislation.

Arising from the foregoing, the following are Engineers Canada's more detailed comments regarding the Practitioners Guide for Procurement Pricing.

- Currently, federal government purchases are driven by policies intended to ensure transparency and value. In many cases, the lowest bid receives the contract. The appeal for selecting the lowest-price solution appears to override the value that can be gained from selection based on qualifications, thereby placing public safety at risk.

- Engineers Canada strongly believes that, in the interest of public safety and to maximize the value of capital investments, the federal government should adopt policies requiring that qualifications-based selection be used as a pricing strategy for engineering-related procurements of goods and services under section 5.3 of the *Practitioner's Guide for Procurement Pricing*. With qualifications-based selection, firms are selected based upon their qualifications to do a project, instead of their low bid.
- As an internationally recognized best practice, Engineers Canada believes that section 5.3 of the *Practitioner's Guide for Procurement Pricing* should adopt policies that require that qualifications-based selection be used for all engineering-related procurements of goods and services. This is especially important in the provision of engineering design services whereby both the overall cost of the capital investment and the life cycle cost of a facility can be significantly impacted by the valuing of qualifications in the selection process.
- Many of the elements of the *Practitioner's Guide for Procurement Pricing* use the term "Professional Judgment" and "Expert Advice". Where such professional judgement and expert advice" are with respect to engineering matters, those exercising this professional judgement should be licensed by a provincial or territorial engineering regulatory body. This should be noted in the guide, along with the requirement that other professionals be so licensed.
- Finally, Engineers Canada strongly believes that the federal government should actively consult and collaborate with the engineering profession on government procurement decisions related to engineering. Collaboration between the federal government and the engineering profession is essential to ensuring that Canadians receive the best possible value from the federal government's engineering-related procurements of goods and services.

Once again, we thank Public Services and Procurement Canada, specifically the professional practices group, for the opportunity to provide feedback on this important initiative. Should you have any questions or wish to discuss the issue further, representatives from our organization would be happy to speak with you. If you need more information regarding this submission or to schedule a meeting, please contact Joey Taylor, Manager of Public Affairs, at 613-232-2474 ext. 213 or at joey.taylor@engineerscanada.ca.

Sincerely,

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Chief Executive Officer, Engineers Canada

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