



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

July 24, 2019

Statistics Canada
150 Tunney's Pasture Driveway
Ottawa, Ontario
K1A 0T6

**Re: Engineers Canada's Comments on the Consultation for the Variant of NOC 2016
Version 1.2 – STEM Perspective**

To whom it may concern,

Thank you for the opportunity to provide comments for the [Variant of NOC 2016 Version 1.2 – Science, Technology, Engineering and Mathematics \(STEM\) Perspective](#).

Engineers Canada is the national organization that represents the 12 provincial and territorial engineering regulators that license the 295,000 members of the engineering profession in Canada. Engineers Canada exists to support the engineering regulators, particularly in coordinating their activities with the federal government. Together, we work to regulate engineering in the public interest.

Engineers Canada has three recommendations regarding the current proposed STEM variant list.

Recommendation 1:

Engineers Canada has identified a clear outlier in NOC 2173 – Software engineers and designers, which is grouped in the A3 STEM Variant for Mathematics, Computer and Information Sciences. It would be more consistent to include this NOC as part of the A2 Variant, to recognize that it is more appropriately aligned with “Engineering and Engineering Technology”. This proposed change would be more consistent with the Canadian engineering regulators’ definition of the practice of software engineering.

Engineers Canada recommends that this NOC be split, with one classification for occupations that relate to software engineering and a separate NOC for software developers and designers.

Recommendation 2:

Currently, “Forest Engineer” is grouped in the B2 STEM-related Variant for Natural and Applied Sciences and Related Occupations. Engineers Canada believes that it would be appropriate to move this to the A1 or A2 Variant, given that there are licences or registrations required for both a Forest Engineer and a Registered Professional Forester.

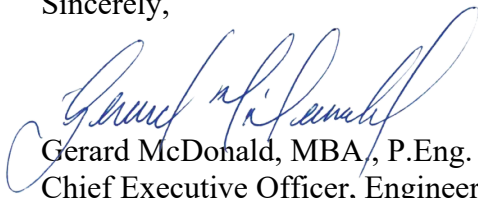
Recommendation 3:

Engineers Canada sees merit to parsing some of the STEM variants into occupations that are subject to professional regulation under respective statutes, and those that may or may not require a professional licence. For the A2 variant, this would segregate “Engineers” from “Engineering Technologists and Technicians”.

Finally, there is no clear NOC that would apply to “Nanotechnology Engineering,” possibly because its specializations span into biotechnology, biomedical technology, materials science, and (electro)mechanical technology. Practice for much of this discipline appears to be related to academic research, with some emerging commercialization of certain nano-materials and nano-machines. It’s unclear whether this would align with either the A1 or A2 variant and possibly there should be future consideration on how to classify occupations in nanotechnology, possibly as an included occupation for NOC 2148.

Once again, we thank Statistics Canada 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,



Gerard McDonald, MBA, P.Eng.
Chief Executive Officer, Engineers Canada

CC: Jeanette M. Southwood, FCAE, FEC, LL.D. (h.c.), P.Eng., Vice President,
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