



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

September 4, 2019

Brennen Young
Director, Policy and Strategic Planning
Regulatory Affairs Sector
Treasury Board Secretariat

Re: Engineers Canada's comments on the Treasury Board Secretariat regulatory modernization consultation

Dear Mr. Young,

Thank you for the opportunity to provide comments on the Treasury Board Secretariat's [Regulatory modernization – request for stakeholder comments](#).

Engineers Canada is the national organization that represents the 12 provincial and territorial engineering regulators that license more than 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 welcomes the federal government's initiatives to modernize the Canadian regulatory system and improve its performance for Canadians and businesses. While it is important to modernize the Canadian regulatory system, it is of utmost importance to respect the role of provincial and territorial regulators, specifically in engineering.

In Canada, the regulation of engineering takes place at the provincial and territorial level. All provinces and territories have laws and regulations covering engineering practice and they have engineering [regulators](#) that ensure those laws and regulations are followed. The twelve provincial and territorial engineering regulators:

- establish and maintain professional and ethical standards
- hold engineers accountable for their work
- govern the conduct of the more than 295,000 members of the engineering profession in Canada

While Engineers Canada believes that effective regulations promote social and economic well-being, protect health and safety, and foster innovation and a competitive business environment, it also believes that it is important to recognize the central role of the engineering regulators in regulating the profession. Provincial and territorial engineering regulators serve the public interest by making sure that only qualified individuals engage in engineering work. In addition, they also ensure that these qualified individuals provide services within the practice of professional engineering and that they are accountable to their

regulatory body for the success and safety of their work. Provincial and territorial regulators consistently strive to ensure that their admissions and licensure practices are timely, transparent, objective, impartial, and fair. They also set high professional and ethical standards, establish codes of conduct, and administer regulatory processes of practice to ensure protection of the Canadian public. It is important that the federal government continue to recognize and support the regulation of the engineering profession in Canada.

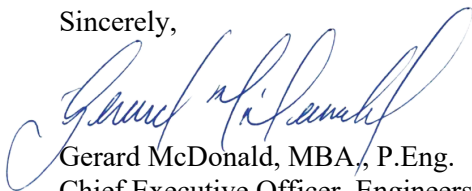
For this consultation, we understand that the Treasury Board Secretariat is interested in targeted regulatory reviews including clean technology, digitalization and technology neutrality, and international standards. Engineers play a crucial role in clean technologies, aimed at reducing environmental impacts in many sectors of the economy as well as the development, adoption, and support of digital tools and processes. Engineers Canada also supports the federal government's efforts in international standards by examining strategic opportunities to reduce barriers to international trade, while ensuring Canada's robust standards for health, safety, security, and environmental protection are maintained. While the international mobility of engineers should be facilitated so that Canada can leverage the benefits of the globalization of engineering services, it is also essential that licensure and the regulation of engineers operate effectively to maintain the high ethics, qualifications, and practice standards that define the engineering profession in Canada.

The public must continue to be confident that professional engineers, regardless of where they received their degree or their work experience, have the right education and skills to practise engineering in Canada with competence and integrity.

Although the federal government works to modernize the Canadian regulatory system, it should recognize and respect the jurisdiction of the engineering regulators and acknowledge that provincial and territorial governments have delegated the authority to regulate the engineering profession to the regulators. In addition, the federal government should promote, within its jurisdiction, the use of licenced professionals in all aspects of engineering work. Finally, the federal government should clarify and enforce regulations, rules, guidelines, and standards that call for qualified, accountable persons to perform work that protects the public when safety management and regulatory compliance are delegated to federally regulated industries.

Once again, we thank Treasury Board Secretariat 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, Corporate Affairs and Strategic Partnerships
Joey Taylor, MSc., PMP, Manager, Public Affairs, Engineers Canada