October 26, 2020

The Honourable Jean-Yves Duclos, P.C., M.P.
President of the Treasury Board
Treasury Board of Canada Secretariat
90 Elgin Street
Ottawa, ON K1A 0R5

Dear Mr. Duclos,

Over the past number of years, several federal departments and agencies that advertise engineering positions within the public service, specifically in the engineering sub-category EN-ENG, do not make engineering licensure a requirement for employment. This lack of a licensure requirement to perform engineering work potentially places public safety at risk. We are seeking the help of the Treasury Board of Canada Secretariat (TBS) to ensure standardization across all federal departments to make engineering licensure a requirement for all EN-ENG positions.

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. 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.

We are aware that there are several positions within the federal public service that are classified in the EN-ENG engineering sub-group. The formal guidelines issued by the Treasury Board of Canada Secretariat do not make occupational certification a requirement across all EN-ENG category positions in federal departments. This creates inconsistent criteria for EN-ENG postings across the federal public service. In those positions where certification is required, the minimum standard refers only to eligibility for certification as a professional engineer in Canada and does not indicate how eligibility is determined. In Canada, any of the 12 provincial or territorial engineering regulators can issue engineering licences; current TBS guidelines do not require an applicant to have applied for licensure or be registered with one of these engineering regulators, placing public safety, as well as ethical and professional accountability for engineering work, at risk.
Two job postings recently brought to our attention illustrate the types of inconsistencies mentioned above:

- Public Services and Procurement Canada currently has a job posting open to the public regarding a position for a Civil Engineer under the EN-ENG-04 category (reference number: SVC20J-022897-000013 selection process number: 2020-SVC-PAC-EA-374278). In order to be considered, applicants are required to be registered as a professional engineer in Canada.

- Transport Canada currently has a job posting open to the public regarding a position for a Senior Engineer under the EN-ENG-04 category (reference number: MOT19J-020801-000006 selection process number: 19-MOT-EA-HRS-96449). In order to be considered, the applicants are required to be eligible for certification as a professional engineer in Canada.

The latter example outlines that certain EN-ENG positions across federal departments are inconsistent with the need to hold a professional engineering license while conducting engineering work. The applicant for this latter position does not have to be licensed to gain employment in an engineering-specific position where engineering principles are applied, which is a concern for the engineering regulators.

In addition, all engineering regulators have provisions in their provincial and territorial acts that prevent non-licensed individuals from calling themselves engineers. By having EN-ENG titles, where the positions reference the term “engineer”, we would expect that role to be filled by an individual licensed as an engineer.

Engineering legislation in all provinces and territories provide engineering regulators with the clear and exclusive mandate to regulate the practice of engineering in the public interest. Engineers Canada strongly believes that the public interest is best served and protected when engineering work is conducted by an engineer who is licensed in the province or territory where that work is being completed.

Professional engineers are held publicly accountable for their work. These layers of accountability and transparency help keep Canadians safe. When postings for EN-ENG positions do not require a candidate to be a professional engineer or at least registered with their provincial regulating body as an engineer-in-training, we will continue to raise our concerns.

Mr. Duclos, the Treasury Board of Canada Secretariat must work with federal departments to ensure that engineering licensure is a requirement for all EN-ENG positions within the public service. Our subject matter experts would be happy to meet with you to further discuss the nature of our involvement in supporting this initiative to uphold public safety. To schedule a meeting, please contact Joey Taylor, Manager, Public Affairs, at 613-232-2474 x.213 or at joey.taylor@engineerscanada.ca.

Yours sincerely,

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

CC: Jeanette M. Southwood, FCAE, FEC, LL.D. (h.c.), P.Eng., IntPE, Vice-President, Corporate Affairs and Strategic Partnerships
Joey Taylor, M.Sc., PMP, Manager, Public Affairs