



Professional Engineers Ontario

June 28, 2004

The Honourable Mary Anne Chambers
Minister of Training, Colleges and Universities
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Dear Minister Chambers,

As you are well aware, the inability of acquiring Canadian work experience is a significant dilemma for many internationally trained professionals. Having seen your dedicated efforts first hand, Professional Engineers Ontario (PEO) appreciates and commends the importance placed on this issue by your Ministry. One of our endeavours designed to solve this problem, the introduction of a provisional licence, is aligned with the Ministry's objective of helping internationally trained workers gain access to employment in their chosen occupations.

The provisional licence provides employers and applicants with the assurance that an internationally-qualified engineering practitioner has satisfied the academic and expected professional practice and ethics requirements. The necessity for Canadian experience ensures that a licence applicant is conversant with Canadian engineering codes, legislation, technical standards and regulations.

Unfortunately, due to a lack of recognition amongst PEO stakeholders, the importance of the licence has not reached its fullest potential. With assistance from your Ministry, we believe that our provisional licence can serve as a model to other occupational regulatory bodies and assist employers, educational institutions, community agencies and other professions, to help reduce the barriers that have kept internationally trained professionals from getting the jobs that make best use of their skills, knowledge, and experience.

The lack of familiarity with the provisional licence may have contributed to the recent decision by the Honourable Minister of the Environment to exclude holders of the licence from the list of qualified persons as identified in Ontario Regulation 153/04 made under the *Environmental Protection Act*. This regulation sets out the requirements that must be met before contaminated sites known as brownfields are redeveloped. It also defines interim qualification requirements for the person who certifies in the record of site condition that environmental site assessments have been completed properly and that the site meets the appropriate standards.

Notwithstanding our objection that this work should be done by a licensed professional engineer or geoscientist, we believe that provisional licence holders are more qualified than any of those designated as qualified persons who are unlicensed and unregulated.

Similar to the position taken with respect to provisional licence holders, the regulation specifically excludes individuals with limited licences. Limited licences are issued by PEO to individuals who, as a result of ten or more years of specialized experience, have developed competence in a certain area of professional engineering. It is also a very useful tool for internationally educated engineers who may not have had the breadth of education afforded by

the Canadian system. A holder of a limited licence takes full professional accountability, however it is in a defined area of engineering.

PEO has questioned the rationale of this decision considering that the Ministry of the Environment has allowed non-regulated practitioners to perform certain acts as outlined in the regulation.

In light of this situation, PEO is appealing to your Ministry for its help in promoting the merits of these two licence categories with your colleagues and specifically, we respectfully request any support you may be able to provide in assisting with the removal of the limited licence exemption from the definition of a qualified person and the addition of the provisional licence to Phase One of the Environmental Site Assessments as detailed in Ontario Regulation 153/04. Holders of limited and provisional licences offer the highest level of public accountability since they are regulated and governed by effective public statutes, and are acting within a disciplinary and enforcement system.

I look forward to working together on these and other issues relating to access to the engineering profession.

Sincerely,

A handwritten signature in black ink, appearing to read 'Kim Allen P. Eng.', is written over a faint, light-colored circular stamp or watermark.

Kim Allen, P.Eng.
CEO/Registrar

Copies: The Honourable Michael Bryant, LL.B., LL.M., Attorney General
 David Zimmer, LL.B., Parliamentary Assistant to the Attorney General
 George Comrie, P.Eng., President, Professional Engineers Ontario