



BC's Union for Professionals

March 10, 2025

sent via pdf

Kate Haines, Superintendent
Office of the Superintendent of Professional Governance

David Pavan, Chief Regulatory Officer and Registrar
Mark Porter, President
Heidi Yang, Chief Executive Officer
Engineers and Geoscientists BC

Dear Kate Haines, David Pavan, Mark Porter and Heidi Yang,

We are writing on behalf of the engineers and geoscientists who are members of the Government Licensed Professionals (GLP) Chapter of the Professional Employees Association (PEA) union.

Our members have growing concerns regarding recent communications from the Office of the Superintendent of Professional Governance (OSPG) and Engineers and Geoscientists of British Columbia (EGBC) about the government's ongoing delay in including all the ministries that employ engineers and geoscientists as government registrants with EGBC under the *Professional Governance General Regulation* (PGGR), Part 1, Section 1.1.

Currently, under the PGGR, only the Ministry of Transportation and Transit (MOTT) and the Ministry of Forests (FOR) are listed as government registrants with EGBC. As a result, engineers and geoscientists employed in other ministries such as the Ministry of Agriculture and Food, Ministry of Emergency Management and Climate Readiness, the Ministry of Environment and Parks, the Ministry of Health, the Ministry of Housing and Municipal Affairs, the Ministry of Mining and Critical Minerals, and the Ministry of Water, Land, and Resource Stewardship are not considered government registrants.

In a September 2024 presentation to the Community of Practice for the Statutory Decision Makers in the B.C. natural resource ministries, the Superintendent of the OSPG indicated the OSPG is still in discussions with EGBC to assess lessons learned from the registration of MOTT and FOR. Additionally, it was stated that there is currently no timeline for extending government registrant status to other ministries.

During the EGBC Annual General Meeting in October 2024, EGBC executives responded to an inquiry from an online participant, stating that discussions are ongoing regarding whether all ministries employing engineers and geoscientists should be included as government registrants under a single registration process. The uncertainty on the timeline for a plan regarding the prescription of ministries as government registrants has created concerns and distress for our members. We respectfully request that the OSPG and EGBC provide a timeline for this decision.

Despite these ongoing discussions, which have now continued for over three years following the registration of MOTT and FOR in 2021, engineers and geoscientists in other ministries remain concerned about the professional and regulatory risks associated with working for a ministry that is not a government registrant.



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According to EGBC bylaws, professionals who do not work for a registered firm or a government registrant are considered sole practitioners. As such, they are required to:

- Obtain a permit to practice from EGBC.
- Develop and implement a Professional Practice Management Plan (PPMP).

Given these requirements, one interpretation of the PGGR is that engineers and geoscientists in ministries that are not government registrants are effectively being treated as sole practitioners under EGBC bylaws. This raises critical concerns:

- These professionals are in a regulatory gray area, as the PGGR is not being applied consistently across ministries.
- Alternatively, these professionals may be required to develop individual PPMPs that not only reflect their specific work but also align with the existing quality management protocols of their respective ministries.

For example, EGBC's Use of Professional Practice Guidelines (Section 3.2.1) states:

To comply with the Bylaws, Professional Registrants must have established... documented quality management procedures related to staying informed of, knowledgeable about, and meeting the intent of all applicable standards, policies, plans, and practices, including Professional Practice Guidelines, and for providing written reasons for departing from any portion of a Professional Practice Guideline.

Applying sole practitioner requirements to individual engineers and geoscientists in non-registrant ministries could lead to a proliferation of PPMPs within the same ministry, generating uncertainty and inconsistency in government engineering and geoscience practices. This outcome seems unintended under the PGGR but is a natural consequence of the current approach.

We would appreciate the opportunity to meet with you to discuss this matter further, offer our assistance, and better understand the progress being made to ensure that all ministries employing professional engineers and geoscientists are recognized as government registrants with EGBC.

Yours sincerely,

GLP Executive

Dwayne Anderson, Registered Professional Forester, Chair
Sarah Alloisio, Professional Geologist, Vice-Chair
Sabiha Sultana, Professional Engineer, Secretary-Treasurer
Rowan Hodge, Barrister and Solicitor, Executive
Elizabeth Hunt, Registered Professional Forester, Executive
Elizabeth Rowbotham, KC, Barrister and Solicitor, Executive
Micah Weintraub, Barrister and Solicitor, Executive