

WE'RE LISTENING

Spring 2015 Consultation Summary

July 30, 2015

The Engineering and Geoscience Professions Act



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1. ABOUT THE LEGISLATIVE REVIEW

It has been more than 30 years since the *Engineering and Geoscience Professions Act (EGP Act)* received its last major update. A lot has changed since then and APEGA needs an Act, Regulations and Bylaws that provide the appropriate authority and processes to regulate Professional Engineering and Geoscience.

As one of the province's self-regulating professions, it is important that we ensure our legislation continues to protect the public interest and reflects current practices in business and industry. That is why Council identified the legislative review as a key strategic initiative two years ago and is working with the Government of Alberta on the development of the new legislation.

Consultation is a crucial part of the legislative review process. The *EGP Act* defines our Members' responsibilities, and it is important that all Members of APEGA and our stakeholders have a say in possible changes to the legislation. The *EGP Act* is provincial legislation developed by the Government of Alberta – which will base legislative changes on APEGA's extensive consultation process and recommendations.

Over the past two years, Members, Permit Holders, and other stakeholders have identified about 200 items for consideration. This input set the direction for the legislative review process. The items were grouped into themes, and the six topics below were identified to start the discussion with APEGA Members and Permit Holders in the spring of 2015.

1. Members in Training (M.I.T.s)
2. Licensees
3. Professional Licensees (P.L.s)
4. Students
5. Authority to delegate
6. Building Code exemptions

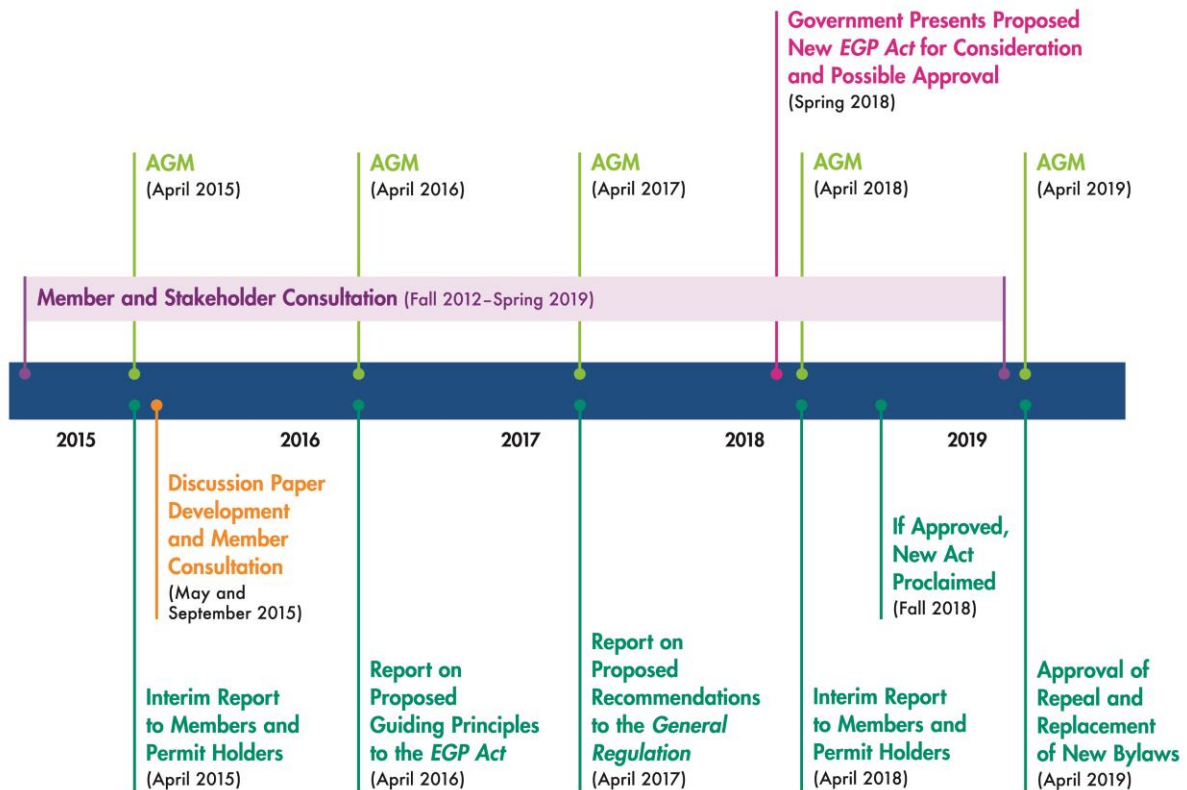
These six topics are not the only proposed legislative changes to the *EGP Act*. More discussion papers are being developed for further consultation with Members, Permit Holders, and other stakeholders in the fall of 2015 and throughout 2016.

APEGA is listening to the input provided by our Members and Permit Holders provided during the spring 2015 consultations. This report summarizes what we heard. We remain committed to reporting back what we hear throughout the process.

2. LEGISLATIVE REVIEW TIMELINE

Reviewing our legislation is a complex and lengthy process, one we anticipate will take until spring of 2019 to complete.

The legislative review process is taking place in phases. We started with the Act. A review of the Regulations and Bylaws will follow. The proposed Act revisions will be presented to Members at the APEGA 2016 Annual General Meeting (AGM). Support for the Regulations will be sought at the 2017 AGM and for the Bylaws at the 2019 AGM.



3. METHODOLOGY

APEGA used a number of methods to provide information and gather input from Members, Permit Holders, and other stakeholders during the spring 2015 consultations. Opportunities to provide input included:

- a professional development session at the APEGA Annual Conference in April 2015
- Permit Holder and Branch events, webinars, and meetings with the legislative review's champions collaborative Members between April and June 2015
- in-person consultation sessions in five locations across Alberta in May and June 2015
- an online survey from April 21 to June 30, 2015
- emails to the legislative review team
- statutory board, Branch, and other committee meetings with legislative review team

Input from Members and Permit Holders is crucial to the review process and will influence recommendations to the Government of Alberta regarding changes to the Act. As the legislation affects other stakeholders too it is important that their feedback also be considered. Stakeholders include The Association of Science and Engineering Technology Professionals of Alberta (ASET), the Government of Alberta, other constituent associations of Professional Engineers and Geoscientists across Canada, and other self-regulating professional associations in Alberta. Their input was requested in the spring 2015 consultations and will continue to be sought in future phases of the legislative review.

Feedback received through the various consultation methods and data from the online survey have been compiled. This information will inform the proposed legislative changes and future consultation opportunities.

The consultations were facilitated by an independent third-party, Soles & Co., and the online survey and data was managed by ThinkHQ Public Affairs Inc.

3.1 Champions Collaborative

The champions collaborative was brought together in early 2015 and consists of volunteers from Branches, Permit Holders, statutory boards, Members, Members-in-Training, and APEGA's leadership team. These champions are helping inform their colleagues of the legislative review process and are gathering feedback on the discussion papers.

The champions began their work in April and by the end of June they had discussed the proposed legislative changes face-to-face with about 400 Members and Permit Holders at Branch meetings, lunch-and-learn sessions, and presentations. A full list of champions can be found in Appendix 1.

3.2 Legislative Review Team Consultation

APEGA's legislative review team conducted a number of visits and made presentations to Permit Holders, Branches, statutory boards, and other APEGA committees to obtain feedback on the proposed changes. This internal consultation gave team members a chance to hear comments directly about the proposed changes from Permit Holders and from Members involved in APEGA's various committees.

3.3 In-person Consultations

APEGA hosted facilitated consultation sessions in late May and early June 2015 to allow Members and Permit Holders the opportunity to provide feedback in person on the proposed changes. About 335 people attended the sessions, which were held in Calgary, Red Deer, Edmonton, Fort McMurray, and Grande Prairie.

During the two-hour sessions, participants reviewed the six discussion papers and provided input on the proposed changes. Worksheets were handed out at the end of each session for participants to provide further feedback. Similar consultation sessions will be held in the fall of 2015 on additional topics.

3.4 Online Survey

An online survey was launched on April 21 and closed June 30, 2015. The survey directed Members to legislative review materials on APEGA's website, and a brief overview of each of the proposed changes to the *EGP Act* highlighted in the spring 2015 consultations was provided to respondents. To maintain consistency, the format of the survey paralleled that of the worksheets used in the in-person consultation sessions. Participants were asked for their level of agreement with the proposed changes. Although 278 Members responded to the online survey, 718 accessed it, or started and did not complete it. The legislative review team is evaluating this to determine if there are ways to improve the completion rate for the next survey, in the fall of 2015.

4. RESULTS

Almost 1,300 Members and Permit Holders provided input in the spring 2015 consultations –1,022 through the in-person consultations and 278 through the online survey. Members were invited to read the discussion papers or refer to a PowerPoint presentation on the APEGA website prior to attending the in-person consultation sessions or completing the online survey.

Of the 278 people who responded to the online survey, many reviewed either the discussion papers or PowerPoint presentations for each of the six topics, but a number of respondents did not review anything before completing the survey. However, a large majority of online survey respondents, 73%, had reviewed the executive summary of all six discussion papers that was available on the legislative review website.

In contrast, virtually none of those attending the in-person consultation sessions had reviewed the discussion papers or PowerPoint presentation before the sessions, and very few had reviewed the discussion papers summary. However, session facilitators gave a brief overview of the topics before discussion took place.

During the in-person consultations, the six main topics generated a great deal of discussion and insight from Members and Permit Holders. Worksheets were provided to participants with the same questions contained in the online survey, with room for additional comments. Verbatim comments from the worksheets can be found in Appendix 3. Notes were made of the comments in the sessions and are available from the legislative review team on request.

The online survey also invited comments from respondents. Verbatim comments from the online survey can be found in Appendix 2.

In addition to the consultation sessions and online survey, Members and Permit Holders have provided feedback on the first set of recommendations through by email, at Branch meetings and other meetings, or at sessions held by champions collaborative Members. That input has also been incorporated into the legislative review team's work.

4.1 Licensee

Licensee is a designation used for individuals who do not meet the criteria for Canadian citizen or permanent resident status but would otherwise qualify for registration as a Professional Member.

Licensees are granted a full licence to practise engineering or geoscience in Alberta and have the full practice rights and responsibilities of a Professional Engineer (P.Eng.) or Professional Geoscientist (P.Geo.) However, they are not granted full privileges to participate in APEGA governance.

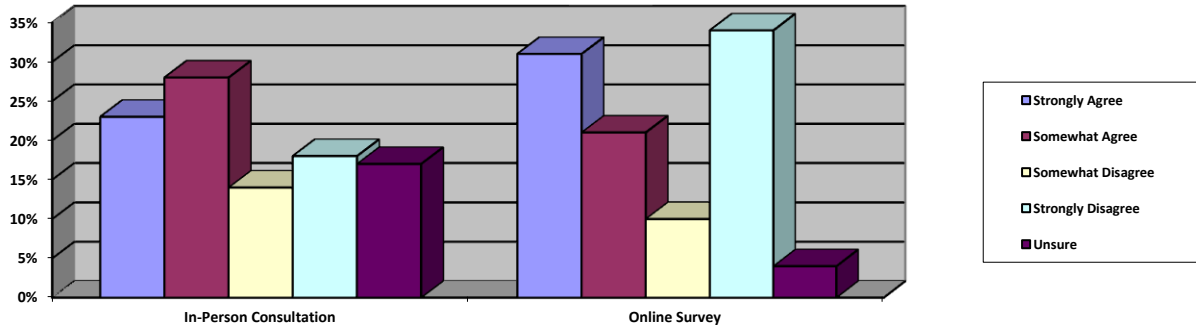
Having a separate category of membership causes confusion to the public – the designation Licensee does not fully describe what the individual can practise.

RECOMMENDATION: Eliminate the Licensee designation so that qualified individuals may be registered as Professional Engineers or Professional Geoscientists, regardless of whether they have Canadian citizenship or permanent resident status.

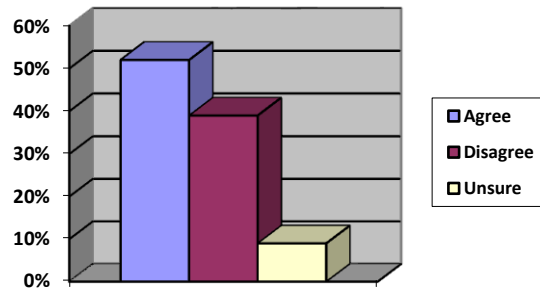
On this issue, results were similar from participants in the consultation sessions and the online survey. When asked for their level of agreement with qualified individuals being registered as a Professional Engineer or

Professional Geoscientist regardless of Canadian citizenship or permanent resident status, 51% of participants in the consultation sessions and 52% of survey respondents agreed.

The in-person consultations revealed that 32% of participants disagreed with the recommendation and that 17% were unsure. This differed from the online survey results – 44% disagreed and 4% were unsure.



Combined Results (In-person and online)



4.2 Member-in-Training (M.I.T.)

Currently, M.I.T.s are not allowed to vote on APEGA matters nor are they allowed to run for Council. Council has reviewed this matter and supports giving these rights to M.I.T.s as valued Members of APEGA. Council believes the right to vote and to run for election will foster M.I.T.s' potential to become more engaged as Professional Members and to fully participate in the self-regulation of the professions..

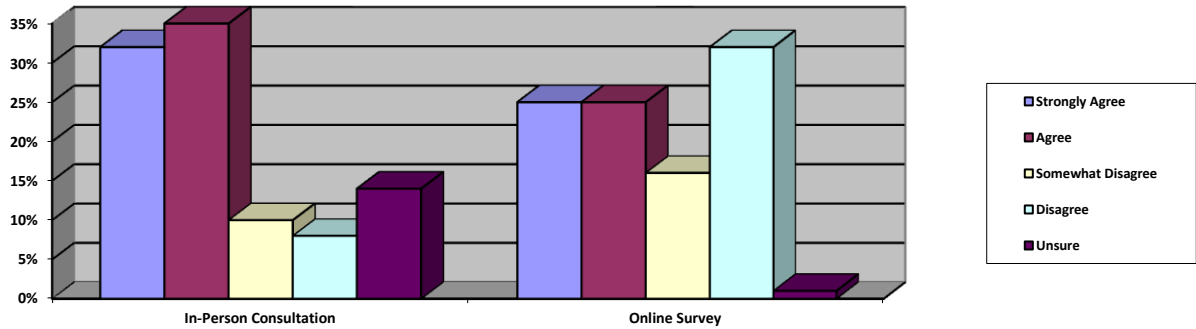
Another issue is the existing eight-year time limit for an individual to be listed as an M.I.T in APEGA's records. It does not adequately take into consideration personal issues that may arise for M.I.T.s. It remains, in principle, that eight years should be sufficient for an individual to obtain the required four years of experience to become a Professional Member; however, it is in the public's and the professions' best interests to revise the legislation to allow APEGA to extend the time limit and be flexible in supporting individual circumstances.

APEGA put forward two recommendations on the issues. Members were asked to what extent they agree or disagree with each one.

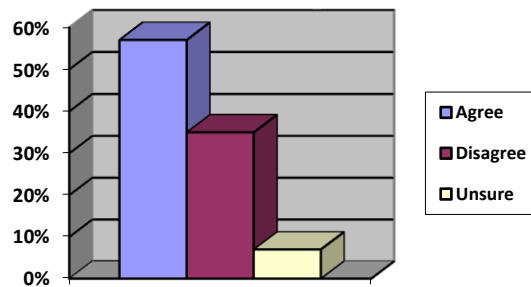
RECOMMENDATION #1: M.I.T.s be given the same privileges as Professional Members regarding APEGA governance matters that would allow them to vote and run for Council.

In the consultation sessions, 67% of the Members agreed that M.I.T.s be given the same privileges as Professional Members. A much smaller number, 18%, disagreed, while 14% were unsure.

In the online survey, 50% of respondents agreed with the recommendation and 48% disagreed.



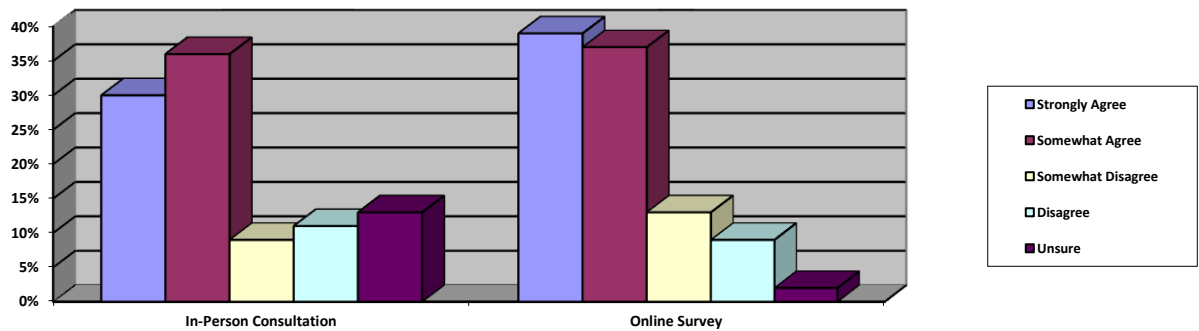
Combined Results (In-person and online)



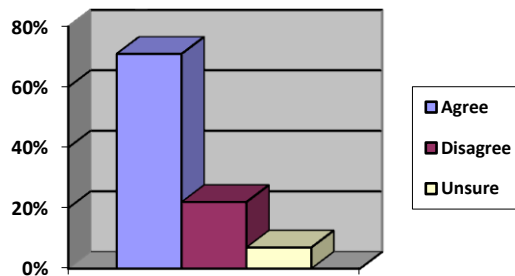
RECOMMENDATION #2: Allow for the length of time an individual can remain as an M.I.T. to be extended to provide flexibility to other unique circumstances.

The in-person consultations found that 66% of participants agreed with the second recommendation for Members-in-Training, while 20% disagreed and 13% were unsure.

Of those who completed the online survey, 76% agreed that the length of time an individual can be an M.I.T should be extended. There were 22% who disagreed and 2% were unsure.



Combined Results (In-person and online)



4.3 Professional Licensee

The current Professional Licensee (P.L.) and Professional Technologist (P.Tech.) designations give individuals without engineering or geoscience degrees the right to independently practice engineering or geoscience within a limited scope of practice. The education, experience and other requirements to become a P.L. or P.Tech. are very similar, with only minor differences.

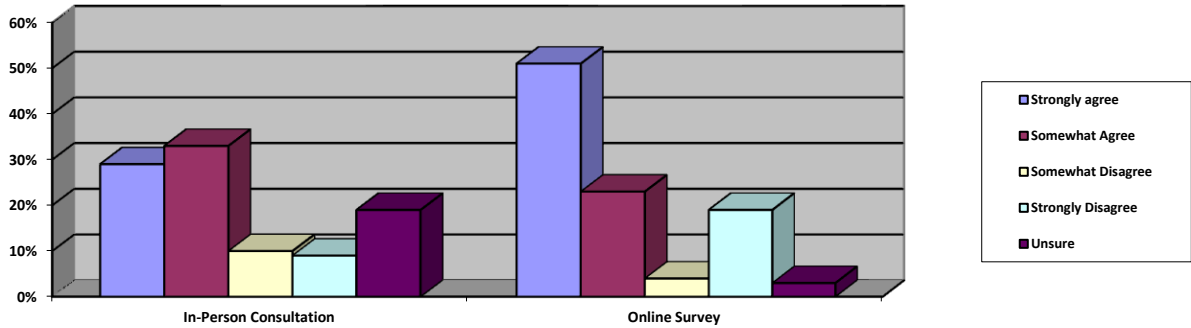
These designations create confusion among the public, the government, industry, and our Members about what the difference is.

Professional Licensee applies to a small portion of the membership and was created at a time when no options existed. Two recommendations have been put forward.

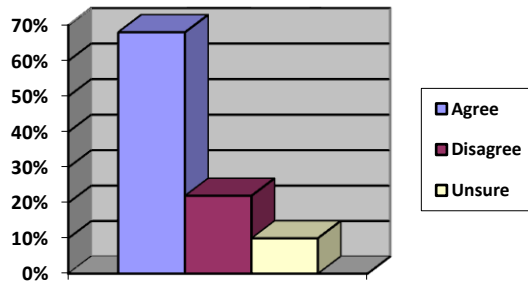
RECOMMENDATION #1: Eliminate the existing P.L. designation. Anyone without an engineering or geoscience degree would apply for a P.Tech. designation through ASET (current P.L.s would be exempt into the new Limited Licence (L.L.) designation.

Of those who responded at the in-person consultation sessions, 62% agreed with the recommendation, 19% disagreed, and 19% were unsure.

The online survey had 74% in agreement, 23% who disagreed and 3% three unsure.

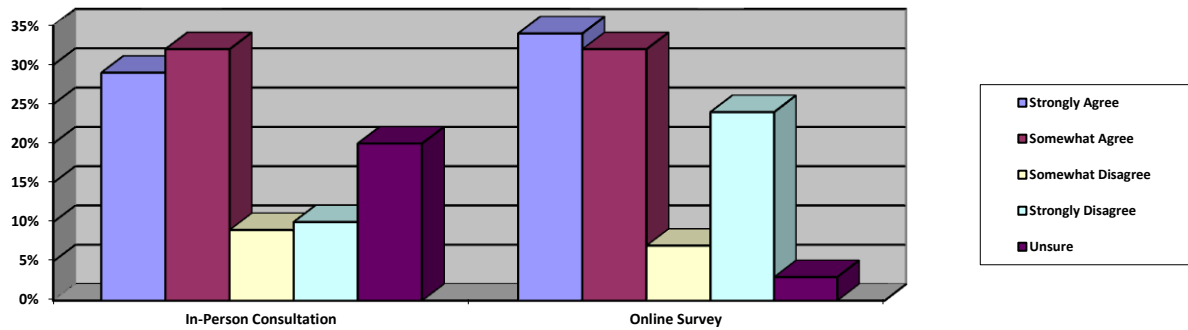


Combined Results (In-person and online)

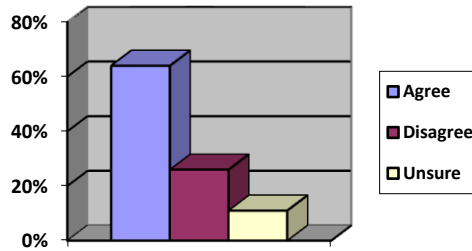


RECOMMENDATION #2: Create a new Limited Licence (L.L.) designation for those with an engineering or geoscience degree, and for those who don't immediately qualify for the Professional Engineer (P.Eng.) or Professional Geoscientist (P.Geo.) designations but are qualified to practise within a limited scope. These individuals could remain as an L.L. for their entire career or may complete additional requirements to become licensed as a P.Eng. or P.Geo.

Overall, 61% of consultation session participants agreed with this recommendation and 66% of online survey respondents agreed. There were 19% of in-person participants and 31% of online participants who disagreed. Twenty percent of in-person participants were unsure, compared with 3% of online respondents.



Combined Results (In-person and online)



4.4 Student

The current *EGP Act* provides for two categories of student:

1. Individuals enrolled in a full-time program at a university in Alberta leading to an undergraduate degree in engineering or geoscience
2. Individuals who do not have an undergraduate degree in engineering or geoscience but who have at least two years of post-secondary education relating to engineering or geoscience

The second category of student (referred to as "special student") is being reviewed. It is unique to Alberta. No other province or territory in Canada has this category.

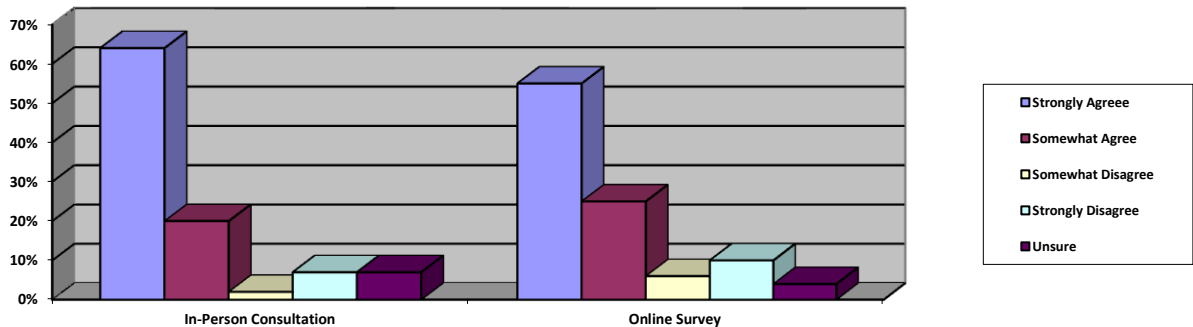
Individuals with only two years of post-secondary education are eligible to apply to APEGA for registration as a Professional Engineer (P.Eng.) or Professional Geoscientist (P.Geo.). However, without degrees in engineering or geoscience, they are typically deficient in a large number of courses and are enrolled as special students.

This special student category has existed since 1981, prior to the introduction of the Professional Licensee (P.L.) and Professional Technologist (P.Tech.) designations. The P.L. and P.Tech. designations currently allow individuals without undergraduate degrees in engineering or geoscience to obtain a licence to practise a specific scope of engineering or geoscience.

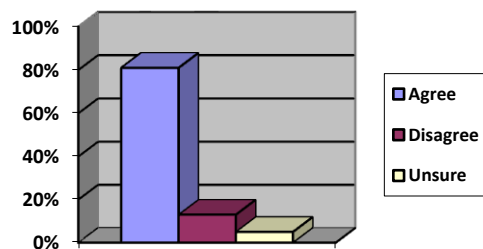
RECOMMENDATION: Eliminate the special student member category. These individuals can pursue the new proposed Limited License or Professional Technologist designation (see recommendations #1 and #2 in Section 4.3).

Overall, 84% of those participating in the consultation sessions agreed that the special student category should be eliminated, while 9% disagreed and 7% were unsure.

Online respondents held similar views, with 80% in agreement, 16% disagreeing, and 4% unsure.



Combined Results (In-person and online)



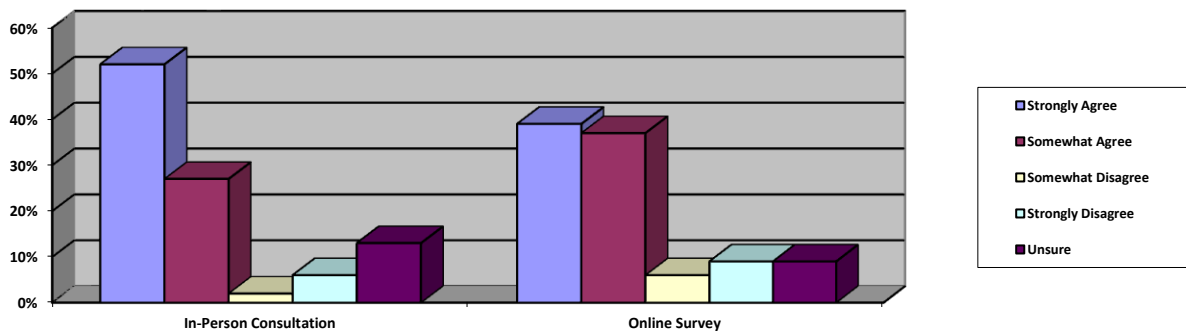
4.5 Authority to Delegate

The *EGP Act* does not expressly authorize the delegation of duties by specific entities, such as the Registrar. Giving these entities express authority to delegate would clarify the legislation, authorize the appropriate entities that execute Association business and align the legislation with that of other professional associations in Alberta and other jurisdictions in Canada.

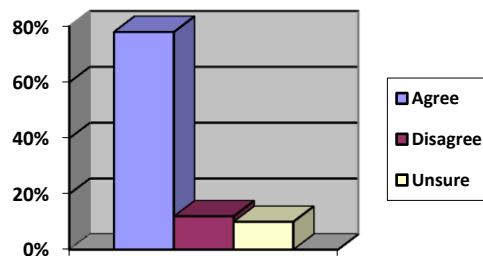
RECOMMENDATION: To amend the *EGP Act* to expressly authorize Council, the CEO, the Registrar, and statutory boards the authority to delegate as appropriate. This would bring clarity to the Act, authorize the appropriate entities that execute Association business, and align the legislation with that of other self-regulating professions in Alberta and other jurisdictions in Canada.

Most Members, data indicate, agree that the recommendation is one that would benefit APEGA and result in better service to Members. Of those who participated in the consultation sessions, 79% agreed with the recommendation, while 76% of online responses were in agreement. At in-person consultations, 8% disagreed, while 15% of online respondents disagreed.

Several respondents emphasized that there should be no delegation of accountability and were surprised that the express authority to delegate duties is not in the current legislation.



Combined Results (In-person and online)



4.6 Building Code Exemptions

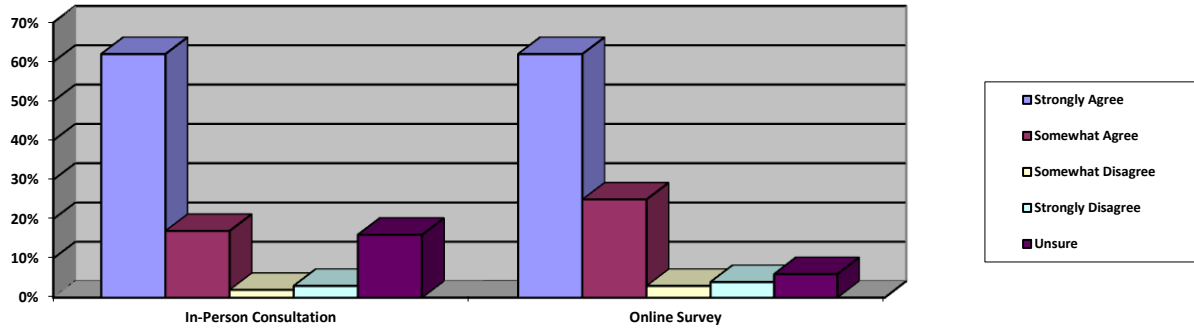
There are a number of building code-related exemptions within the *EGP Act* that allow individuals and entities to practice engineering without being licensed with APEGA if the activity relates to buildings of a certain type, size and occupancy.

The *Architects Act of Alberta* and the *EGP Act* both share wording from the 1982 Alberta Building Code. Wording in the two Acts, however, is not identical to the wording used in the code. In addition, building structures and building science have evolved since the 1980s. These sections within the Alberta Building Code,

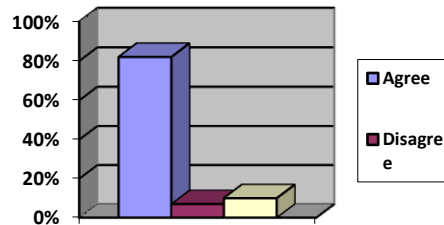
the *Architects Act of Alberta*, and the *EGP Act* – which relate to exemptions – do not reflect these changes because of the difficulty in updating three pieces of legislation at the same time.

RECOMMENDATION: Repeal the Building Code exemptions in the *EGP Act* and reference the current Alberta Building Code as the source for relevant exemptions.

A majority of Member respondents agreed with the recommendation – 79% of in-person participants and 87% of online participants. Only 5% of in-person participants and 7% of online respondents disagreed, with 16% of in-person participants and 6% of online respondents indicating they were unsure.



Combined Results (In-person and online)



Comments suggest that this recommendation makes good sense and is particularly mindful of APEGA’s obligation to the public interest, public safety, and public well-being. Although outside the purview of the legislative review, some commenters requested that APEGA continue to provide input into any changes to the Alberta Building Code.

CONCLUSION

APEGA's legislative review has reached a significant milestone with the conclusion of the spring 2015 consultation sessions. Members and Permit Holders took their responsibilities to their professions seriously and provided invaluable feedback on the first set of proposed legislative changes.

With the help of the champions collaborative, we reached about 1,000 Members and Permit Holders in face-to-face consultations, and almost 300 Members completed the online survey. We have also gathered input from engineering and geoscience constituent associations in Canada and from other self-regulating professions in Alberta. APEGA appreciates the time and thoughtful insight provided throughout the consultation process.

Based on feedback from the spring 2015 consultations, the proposed legislative changes may proceed as planned, or with amendments to the proposed changes to accommodate what APEGA heard is important to Members and Permit Holders.

Another set of proposed legislative changes to the *EGP Act* will be discussed in fall 2015. Building on the strength of the spring 2015 consultations, three formal consultations are scheduled for Calgary and Edmonton in late October and early November 2015. Once again, an online survey on the proposed changes will be available. More details on the consultation sessions and the discussion topics for the fall will be available on the legislative website (www.apegalegislativeconsultation.ca) in early October 2015.

APPENDICES



Appendix 1 – Champions Collaborative Members

Ahmed Ali, P. Eng.

Aldous Walters, P.Eng.

Ana Tanaka, E.I.T.

Anil Gupta, P.Eng.

Brennan J. MacDougall, P.Eng.

Brian Morrison, P.Eng.

Charles Henderson, P. Geol.

Charles Welsh, P. Geoph.

Chris Ward, P. Eng.

Craig Maunder, P. Eng.

Curtis Alexander, P. Eng.

Dr. Dale Leckie, P. Geol.

Dr. Deborah Spratt, P. Geo.

Gobind Khiani, P. Eng.

James Ferguson, P. Eng.

James Vanderzwaag, P. Eng.

Jennifer Enns, P. Eng.

Kathy Diaz, P. Geo.

Ken Mitchell, P. Geoph.

Kirstine Hull, P. Eng.

Manoj Mistry, P. Eng.

Mark Bradshaw, P. Eng.

Mary Ann Byrd, P. Eng.

Monika Bhardwaj, P. Eng.

Nathan Schmidt, P. Eng.

Naval Tauh, P. Eng.

Nawras El-Akkad, P. Geol.

Neda Boroumand, Geoph. I.T.

Paul van den Camp, P. Eng.

Peter Doell, P. Eng.

Dr. Rachel Newrick, P. Geoph., P. Geol.

Rob Vestrum, P. Geo.

Roghoyeh Salmen, P. Eng, PhD.

Sadiq Pirani, P. Eng.

Samantha Oler, P. Eng.

Stephen Huber, P. Eng.

Suresh Sharma, P. Eng.

Dr. Tony Cadrin, P. Geol.

Tracey Stock, P. Eng., LLB

Victor Benz, P. Eng.

Vincent Chiew, P. Eng., PhD.

Appendix 2 – Verbatim Comments from Online Survey

The following feedback is from the online survey. The comments have not been edited.

#1: Many of the questions were lacking certain details to allow an informed response. Example#1: MIT what is the current time limit they can be an MIT? This info was not given and would frame the response (ie if they are given 1 year to be an MIT vs they are given 8 years to be an MIT). Example#2 LL designation: no information was given as to what rights this designation provides.

#2: Authority to Delegate: It would be helpful to give an example of the issue that APEGA faces on this topic.

#3: It would have been extremely helpful to have the ability to go backwards in the survey and adjust answers or review the previous pages information. Thank you the survey and the opportunity to provide our input.

P.L, P.Tech, C.E.T, R.E.T, L.L etc seems very confusing and partially overlapping. What is the need of creating this confusion?

By eliminating Technologists from APEGA you are cutting off a large stream of expertise. That seems like the wrong thing to do in a province strapped for experienced resources. Especially if companies will not consider an employee for advancement if he/she is not an APEGA member.

Eliminating the word Professional from P.L. indicates they are not Professionals and have no stamping authority. For individuals that have been experts in their field for 20+ years the designation Limited License does not reflect that expertise.

Professional Licensee - I recommend that the new Limited License (L.L.) category of APEGA membership to include individuals with non-Canadian engineering/geoscience degrees who do not immediately qualify for Professional Engineering (P.Eng.) or Professional Geoscientist (P.Geo.) designations and regardless of number of exams assigned. The reason is to be (L.L.) a category of membership that APEGA designates for landed immigrants comparable to M.I.T. I believe this will encourage and help landed immigrants to complete the requirements to become more involvement as Professional Members, and gives them the ability to practice engineering or geoscience within a limited scope of practice.

A very well researched and presented proposal.

APEGA must eliminate unlicensed Engineering Monopolies such as ABSA and allow Engineers to deal with their own design issues or delegate additional organizations to handle pressure vessel design registrations.

APEGA should, as the legal entity representing engineers and geoscientists in Alberta, be working to safeguard the privacy of its members. Privacy and data security need to be priorities in this update to the Act, and should be more significantly regarded and prioritized in the day to day operations of APEGA.

APEGA, through the Eng. Profession Act, should take harder stance against practice of some engineering companies to do design abroad and have documents checked and stamped in Alberta. Such practice violates "direct supervision" requirement and has catastrophic impact on engineering jobs in Alberta.

Apega needs to clearly spell out for the engineering profession that a P.Eng can not call themselves a geologist, or a hydrogeologist.

Can APEGA clarify the issue in some companies where they have PL(Eng) that approves and stamped the design of a P.Eng, it seems odd.

Caution should be taken to provide the Licensee category to access a position on APEGA's council.

Changes to the EGP Act must focus solely on protection of public safety. Create a separate group from APEGA to provide member services and advocate for engineering.

Disagree strongly with eliminating PLEng members as many diploma educated people have risen to very senior lead/manager level positions in their career and need to practice engineering independently.

Eliminate the PL designation and designate all foreign trained applicants as LL. Once applicants have acquired permanent resident status or Canadian citizenship, providing they meet all other requirements for registration with APEGA, they can be registered in the appropriate category.

The PTech. designation should not contain the bracketed words (Engineering) (Geologist) (Geophysicist) or (Geoscientist). The use of the word 'Engineer' as an adjunct to the designation Technologist does not provide any clarity for the general public regarding the distinction between the training and qualifications required for the designations and confuses the public regarding the difference between an Engineer and a Technologist.

Eliminating Special Student Category: APEGA should not be an education source – there are other options. The overwhelming failures is also an indication this system isn't working. Clearly the intent of this category was for a different age and is no longer relevant. Everyone should be measured by the same yardstick and obtain the proper degree if they want to be a professional member of APEGA.

Elimination of the Licencee category will enable non-Canadians to be full professional members (given the requisite qualifications are met) is a huge step forward in an increasingly global world where IOC's have expats working in Canada or on Canadian projects from outside Canada, and allows them full professional status in Alberta/Canada. It also will speed the integration of professionals who emigrate to Canada into APEGA.

Elimination of the PL designation and association with APEGA is a terrible idea. To equate this with the ASET designation is inane.

Engineering salary needs review.

For the elimination of "Licensee" based upon Citizenship, we will need to ensure that participation by non-Canadians is somewhat limited to maintain control of APEGA by Canadians. For the Delegation issue, do other Eng/Geo associations currently allow for this? And what limits will be placed on this sub-delegation?

Have one organization and one designation, doesn't matter if you have a degree it's what your capable of. Having a designation doesn't mean your good at what you do.

I am against granting license to individuals in the remote part of the world practicing engineering/ geoscience in Canada. I would like to compare such requirements with the similar organizations in the other parts of the world - Europe, Japan.

I believe APEGA was due for these changes and I appreciate having them addressed at this time. These changes will bring clarity to the public and even to APEGA members. On the other hand, I appreciate the delegation of authority, this will give other members the opportunity to experience decision making and allow the officials to reliably be covered and getting issues resolved when they can't be available. Thank you

I believe in order to be a fully licensed member of APEGA, you should be a Canadian citizen and have a permanent residence in Alberta. Allowing non-Canadian citizens or non-permanent residents to have full membership and voting rights takes away from the Albertan population as a whole. It is difficult to fully serve the needs of the public in an appropriate manner without knowing the people you're trying to serve.

The L.L. designation also diminishes the and negates the work that all fully licensed APEGA members must go through. If you would like to go forward with the L.L., I would put a timeline on it, so they must either finish the qualifications to become a fully licensed member of APEGA. If they don't want to put in the effort, they can apply for the P.Tech designation. I believe giving M.I.T.s a broader role is a step in the right direction but the majority of them don't have the experience or knowledge to be on the boards or vote on issues that affect multiple disciplines.

Allowing them to sit in on board meetings, or be assistants to some of the board members would give them exposure to the positions and the issues and allow them to build up that experience so when they do become fully licensed members, they can serve on the boards competently.

I don't see the point in creating a new L.L. designation to replace the confusion of having a P.L. designation. It would still be confusing. Persons eligible for L.L. should just apply for a P.Tech. and if they qualify for a P.Eng. in the future then they can apply for the new designation.

I have no objection to MLTs voting on Apega matters. I do object to them holding positions on council. As they do not have the experience to practice independantly, I do not believe they have the experience to be on council.

I partially disagree with the proposed change to "Licensee." I agree that the designation should be removed. However I believe non-citizens and non-residents should still be restricted from governance matters. Therefore I feel they should be granted P.Eng/P.Geo designation but with a restriction from governance. This means the restriction would have to be administered internally by APEGA in order to avoid public confusion. I agree with the points that public confusion should be eliminated and that qualification for Licensee has no bearing on the competency of the individual, however I feel governance of the association is a right that ought to be granted solely to the citizens of country which the association resides.

Given most of the Licensees are U.S. professional engineers, I suspect the only reason they have obtained the designation is to qualify to complete work in accordance with other Alberta regulations (such as PESR/ABSA) and they have little interest to actively participate in governance and decision making. I also believe there is an issue to safeguard control of the associataion and subsequent influence over practice. It is conceivable, however unlikely, that a dedicated sub-set of the population could gain control of the council particularly if there was a, or preceived, economic benefit. Such tactics are certainly not absent where elected bodies exist and it is my belief that the association also has a duty to maintain safeguards from such cases.

I read the summary and support all changes. I did not think it was necessary for me to review each in detail. I prefer to defer to the expertise of APEGA leadership.

I somewhat agree with the idea of granting PEng or PGeo to qualified individuals who doesn't carry Canadian citizenship or PR status. My only concern about such individuals is: What if they misconduct in Alberta and then leave Canada? Is there strong tie between Canada and their countries of citizenship so that APEGA can chace them abroad? If not, the public should be somehow aware of the risk of working with such licence holders.

I strongly disagree to eliminate P.L. Eng. grade considering we introduced this not too many years ago and for all the reasons we created the grade in the first place.

I think I'll forward my comments separately to the legislative review Email address.

I think there is an inherent discrepancy between a P.Eng whom lives in Alberta or Canada then a forgein engineer regardless of the person's qualifications. Simply put, there is a difference in the logistics of enforcing any tort law statues. The Canadian citizen/PR takes on more risk.

I was unsure on the delegation item - I think you need more concrete examples of how this would be applied.

I would be extremely disappointed if the P.L. (Eng) designation is eliminated. I have had the designation for over 5 years and I have had no issues with people in the industry being confused with what responsibilities my designation provides me. If there ever was any confusion I would be more than happy to explain to anybody what my scope of practice is and I believe that is my responsibility to do so. I worked very hard to attain the P.L. (Eng) designation and Apega did a very good job scrutinizing my credentials to ensure that I was qualified and that I would be an asset to the association. I believe that I have fulfilled those requirements and as such I believe that I should retain my current designation of P.L. (Eng)

I would be very disappointed if the P.L. (Eng.) category was eliminated. There is status given and recognized by the public having APEGA associated with a professional designation and to a lesser degree ASET, in my opinion. I also feel it is unfortunate that APEGA does not recognize the lifetime experiences gained by an individual in his/her discipline towards grandfathering or special achievement acknowledgement as a Professional Engineer having only an Engineering Technology Diploma.

If citizenship or landed status is not required to practice, could people actually be practicing without a work permit or from outside Canada? from an employment an ethical position, this does not seem right.

If we eliminate the requirement for citizenship or residency for a P.Eng there is no way to ensure the people practicing engineering in Alberta are actually residing in the Province. This is very alarming to public safety, as the ultimate engineering authentication needs to come from an individual who is in tune with and capable of responding to changes in local conditions. This would not be true of someone practicing engineering but residing in another country.

I'm always concerned when APEGA starts to allow people to practice engineering without the proper education. (It's too easy to fake credentials.) Allowing anyone from another country without an education from a recognized educational institution seems like a dangerous idea. PASSING EXAMS IS NOT THE SAME AS AN EDUCATION. I'm concerned that the new LL designation is similar to the failed attempt previously by APEGGA to allow people to practice engineering in a defined scope, but without an engineering degree. This was only an attempt to allow large companies to hire cheap labour instead of the sure and safe practice of hiring engineers.

Engineers from other countries may not have a full understanding of the challenges in Alberta. (Weather, logistics, etc.) I oppose any changes that may barter the safety of the public and the professional image engineers in Alberta strive to maintain for the profit of companies. Members voted it down before, and with good reason.

In your effort to simplify the nomenclature to appease an audience that you have not defined to us I would think we are slightly myopic in your analysis. You cannot always simplify the complex, let me provide a personal example; I have been in the utility business for 34 years.....my role has been in line design, This area of expertise is not a discipline within APEGA like civil/electrical/mechanical.....but you allow and of the aforementioned disciplines to take on the role with no to very little transmission line experience.....why is that.....what Process in the APEGA system qualifies and P Eng to design transmission lines which involve a broad knowledge of electrical/mechanical/structural/materials.....Do you not think that defining the designation by competence is a better approach? Because if you don't then I should be reporting quite a few of the APEGA members for doing work outside of their designated field of expertise.

I will make myself available for a more thorough and robust conversation if you like. On a final note I do appreciate the excellent effort of the entire APEGA staff and appreciate the opportunity you have provided me to express my opinion.

It must be clearly set out by APEGA that Engineers cannot hold non engineering positions and Non engineers cannot hold engineering positions. A lot of mess is happening around oilsands sites that are using this grey area to have non engineers and engineers working under the same position title. The non engineer is not working under the engineer for the title and this is a serious risk to people and industry since non technical people are making technical decisions. I have brought this up in the past but APEGA regulator tried convincing/interpreting the code by saying its ok for non engineers to be in engineering positions and engineers to be in non engineering positions. Dumb Dumb Dumb.

Just wondering if it makes sense to roll the limited licensee designation into the MIT designation. This will ensure that all designations in APEGA leads to a PEng or PGeo. There appears to be no incentive for the LL to pursue a professional designation as they can remain in LL designation permanently. Maintaining several designations especially ones that the proportion of the members number might be less than the effort to maintain the designation does not appear a good use of resources.

L.L shall be replaced with MIT unless the responsibility is clearly defined.

Leave designations as is, no benefit to anyone on proposed changes.

Licensee - APEGA members must be Canadian citizens or immigrants.

Licensee - APEGA needs to control members. I do not see how they could do this for foreign members who do not live here or work here.

Re MITs - Yes to the right to vote, but running for MIT council would be better once they have their designation. I agree that we should extend length of time as MIT.

For P.L. the word "limited" separates it from P.Eng. or P. Geo and it should be to remove confusion. The current system does not seem to work well for vast majority (students). APEGA should work through universities for education part. APEGA should be a regulator only.

On Authority to Delegate issue, it would allow the process to be done more efficiently. Delegation is a standard procedure

in most industries.

To have one building code that all professions adhere to makes the most sense. If one profession wants some special considerations, they can do it as a part of that one building code.

Licensee - not a big fan of the ability for someone who doesn't live in Alberta to have the ability to run for council (could this maybe a change to the council rules - i.e. needs to be residing in Alberta for the term?)

Licensee - You should require a non-resident to state why they want an APEGA license.

MITs could run for Council but should not be allowed to be members of the Executive. MITs should have only a limited number of spots on Council. APEGA should have the flexibility to extend the MIT time period in individual cases.

P.L. change - I like the direction of this. The problem could be with non-engineers like human resources people who might not understand the difference between P. Eng and a limited licensee.

students - yes because the current process is not working. APEGA is putting a lot of resources into a program that has poor results.

Authority to Delegate - the efficiency of APEGA needs to be improved. This is low hanging fruit.

BCE - lets not over engineer when we do not need to.

Licensee change - would help qualified non-Canadians and non PR to practice in Canada.

MITs - it will help MITs to become more active in APEGA affairs. Also allow them as MIT for an extended period.

P.L. - because it is good for those with engineering degree but do not immediately qualify for P. Eng.

Student - it enhances APEGA's capability to evaluate qualifications of individual's degree in Engineering particularly for foreign qualification student and also will help those students to obtain P.Eng with an upgraded qualification in Engineering.

Delegating - bring more clarity to the legislation and give more clear lines of authority. It eliminates the need for interpretation of delegation.

BCE - it will protect public protection with the latest version is implemented.

Licensee: I believe that the recommendation as currently proposed should be divided into two parts. I do not agree with the proposal as written but I do agree that The Licensee designation be eliminated and that the qualified individuals may be registered as Professional Members without the right to vote and without the right to run for election to Council. I strongly believe that the right to vote and the right to run for election to Council be limited to Canadian citizens or permanent residents.

Authority to Delegate: I do not agree with the proposed "Authority to Delegate" as written. Much of the purpose of this review is to add clarity and remove ambiguity. I believe that the "Authority to Delegate" should be re-written as ".... to delegate their authority and duties, as appropriate understanding that the accountability and responsibility shall remain with the designated APEGA Council, Registrar, statutory body or CEO. As written it could be construed that the duty of responsibility and accountability could be delegated. If re-written as I have proposed then I would be in favor of this change.

Licensee: if a member has the same obligations, they should have the same rights.

MITs should be allowed to vote on items that might affect them. If you can vote, you should be able to run.

Re Licensee category - the term Limited helps clarify the designation.

Student - it appears that this entails a lot of effort and resources for limited value in addition, individuals have other options to obtain designation.

<p>Authority to delegate - delegation is a regular common process for large organizations.</p> <p>BCE - building codes belong in the Building Code.</p>
<p>Make out of country Engineers work for minimum of 4 years to be able to apply for P.Eng.</p>
<p>More needs to be provided about the oversight mechanisms for delegated authorities prior to furthering that element.</p>
<p>No benefit to members or public to change P.L. Eng designation.</p>
<p>No licensees designation. Only P. Eng. or P. Geo.</p>
<p>No real place to comment, but the P-Tech is not a like for like replacement of PLEng. I don't support the change unless there is a like for like proposal at the ASET or APEGA organization. DO like the Grandfather clause for existing PLEng.</p>
<p>Non-canadian should be able to get status, but must meet all the requirements and take the tests required for membership.</p>
<p>Non-residents and non-Canadians should NOT be given full privileges to participate in APEGA governance matters. They certainly cannot vote in provincial elections and cannot be effectively governed by the laws of Alberta or APEGA when they live offshore or leave Canada to avoid prosecution, so why should they have a say in changing APEGA's bylaws and governance? Why is the Alberta Legislature so intent on sending Engineering and Geoscience jobs offshore where they cannot be governed by the laws of Alberta or APEGA? Simply educating the public that a Provisional Licensee is academically and technically qualified is preferred to using the PEng/PGeo labels to hide the fact that some members have not yet been vetted by a registered PEng/PGeo supervisor and may not be aware that the fraud, bribery, etc. common in their home country are not legal in Alberta; we should not be encouraging future Bre-Xes.</p> <p>This questionnaire asked whether boards etc. should have the ability to delegate certain authorities, which I do agree with, however the current draft version of the legislation is worded much differently, calling for the Registrar and BOE to jointly share authority, which I strongly disagree with and it makes me wonder if this entire survey was designed to pull the wool over our eyes as to the true intent of the proposed legislative changes.</p>
<p>Nothing is broke, do more on benefits for members.</p>
<p>Offshore engineering is a large concern and should be considered as it has negatively impacted many APEGA members.</p>
<p>On the Licensee front...as one who holds Licensee designation in several other provinces, I would love to see this one eliminated. Just because I do not live in that province (or in our discussions may not be a permanent citizen yet), does not mean that I am not qualified to do the work or provide insight to the Association.</p> <p>I disagree with the creation of the L.L. designation for the exact same reason that we are looking at getting rid of the P.L. designation...If you don't qualify for a P.XXX designation, go for the P.Tech for now and if you can upgrade/qualify later, then get the P.XXX. Thank you.</p>
<p>On the matter of eliminating P.L.Eng members, I trust APEGA will consult with engineering employers in Alberta together with members holding that grade of membership.</p>
<p>P.Eng deserves more engineering authority, rights and responsibilities than the P.Tech as it is a higher level of education. The incentive to obtain an engineering degree is compromised for prospective students when compared to a technology diploma, when both provide similar designations.</p>
<p>People are just figuring out the PL Eng now you want to start over again instead of completing and required awareness. You have bigger issues to deal with incompetent P.eng's hiding behind a designation.</p>
<p>Perhaps bundle files in a zip/rar folder so you download the whole package at once.</p>
<p>Please clarify the scope for PTechs. At present, it is clear that PTechs/PLs are allowed to practice engineering</p>

independently but not so clear if they are allowed to certify the work of others. And if it is proper for a PTech/PL to certify the work of a P.Eng just because the P.Eng. is a subordinate in terms of their position in the company.

Pretty much smart and intelligent changes proposed. Well done! Our Registrar as well is clearly doing a great job!

Re Licensee: I strongly disagree with the concept of giving non resident individuals the right to vote on APEGA matters. Those who do not live in the country and or have citizenship are by definition foreigners. If they meet the requirements they should be allowed to practice, but opening the door to having the association influenced or controlled by persons who do not live here and may have very different standards and agendas is not in the best interest of the public, members, or the association. I question how significant the confusion re scope of practice really is. This sounds like a case being made by a vocal minority whose interests are not necessarily aligned with the members. If this is a real issue, it should be addressed by better information and education of stakeholders, not by encouraging foreign control of APEGA.

Removing the PL ENG designation borders on discrimination, and will not be removed quietly.

Self regulation some times leads to self interest bias and lack of vision missing issues that of critical importance.

Strengthening the APEGA brand is welcomed.

Thank you for providing this informative survey.

The biggest confusion is that ASET and APEGA both appear to provide engineering services. A combined association with P. Eng. and P. Tech levels would help clarify things better than the proposals here.

The fantastic summary allowed me to quickly get up to speed and evaluate my position on the issues. Thank you!

The idea to allow those without Canadian residency or citizenship to share our professional designation is not a new one and it was not widely received during previous attempts. This strikes me as yet another attempt to do two things: 1) Garner more memberships for APEGA and therefore increase the income stream to a supposed governing body who has questionable use to most practicing engineers 2) Degrade the value of the P.Eng status in Alberta. I see no value to us as a professional organization in allowing this change to go through and see only the benefit from people who will never add to the professional status of Engineering IN Alberta. Association of Professional Engineers and Geoscientists of Alberta. It's in the title. Let's keep the standards as high as possible.

The issues of engineering documents ownership and contract laws should be looked at. The engineer should be allowed to obtain copies of his/her work for future references and for protecting him/herself against claims. This should be without having to ask for permission to obtain them. I think it is in the best interest of public safety that we retain copies of our work in case if the original work is altered or misrepresented.

The mandate for APEGA is ultimately to protect the public. In this vein, it should always be paramount that the organization focus on administration and self regulation and not discussion on how to bring more members into the fold via different designation.

The removal of the PL (Eng.) designation is a horrible idea. If this goes ahead, I see Apega having to defend this within the legal realm.

There is a distinct enough difference in the P.Tech and the PL Eng that should ensure the PL Eng remains. While similar, the PTech is still limited to scope but also to routine application of industry recognized codes, standards, procedures and practices. The PL Eng is not limited to this and it is inaccurate to suggest that replacing the PL Eng with the PTech is the same.

There should be a limitation on the length of the new LL designation. Treat it like the MIT, force a decision on whether to pursue a P.Eng or a P.Tech, otherwise you still have the confusing licensee designation for the next 20-25 years.

There should be no Licensees as defined. Either you are a P. Eng or P. Geo. APEGA Licensees should only be granted to those who are already either P. Eng. or P. Geo. from another Canadian province and who wanted to register in Alberta.

To be a member of APEGA, one MUST be a Canadian Citizen and/or reside in Canada.

Too many changes already, work with the one already in place.

Try to put some emphasis on finding jobs.

Appendix 3 – Verbatim Comments from Worksheets

The following feedback is from the worksheets submitted at the in-person consultations. The comments have not been edited.

8 year time limit should remain, but board should be able to grant extra time to deserving candidates.
8 years experience should be a guideline but not a hard stop for MIT members. LL may seem as a demotion to people who currently hold PL designations.
A FLIC given registration in AB can misuse the designation. MIT timelines should be reviewed on an individual basis. PL should not be eliminated as some people purchase their international degrees and have no experience. APEGA needs to be a part of the building code process.
A graduate is educated enough to make sensible judgments, vote or run for an election.
Agree with FLIC proposal as long a they meet all tests and abide by the APEGA act. MITs should have the right to vote and have a say. More flexibility/time would be beneficial. Need more clarity on LL designation. Student- too much resources used to help too few that would qualify.
Agree with FLIC proposal. Getting more people voting would be good. 8 yrs for an MIT is long enough. Let MITs vote but not run for council.
Agree with FLIC title change but not sure about voting issue.
All views of members are important. Include MIT and FLICs. Agree with eliminating PL, but don't create LL designation.
Allow exceptional exemptions for MITs and also increase the experience time limit. How would public know what defined scope is? What value is LL going to provide? Prefer PEng=APEGA PTech=ASET. Delegation options must be stated and limited.
Allowing MIT to vote/be on council will help with the case in Calgary where they were forced to unionize- CUPE Local 38 case. How does LL name protect public interest?
APEGA has obligation to the public to inform if a professional member is Canadian or not. Eliminate student category but leave a window for special cases.
APEGA members must be Canadian citizens or immigrants. Professionals without degrees should be ASET members. The Act should refer to the building code instead of introducing different spectrum of requirements.
APEGA needs no not simplify designations, but instead, educate public on existing designations. FLICS should not have a say in APEGA governance. MITs do not have the experience.
LL designation diminishes the importance of the profession. There are many technologists that have more experience than some engineers, these specialists should have an avenue to practice. PL should remain. Engineers still need to have input into the building code if removed from the EGPA.
APEGA needs to control members. Do not see how they could do this by foreign members who do not live or work here. Delegation is standard in most industries, would allow APEGA to be more efficient.
ASET and APEGA must maintain clear separation.
Authority to delegate must include specific criteria.
By changing FLIC designation a roadblock would be removed and more people would be able to contribute to Canadian society. LL will eliminate confusion.

Changing FLIC designation puts all members on equal footing. Benefit through involving MITs more in the APEGA process.
Changing FLIC designation will increase the amount of work share and low wages in engineering accordingly.
Changing FLIC opens the door for more abuse of the system.
Changing FLIC rights would dilute PEng voice and would be an opportunity for foreign agendas to override Albertans. MITs do not have the experience to vote. MITs should only have 5 years to gain experience. Delegating authority is too open ended. Building code proposal is better protection of the public as its a unified source of information.
Circumstances for MIT deadline should be defined. Authority to delegate suggestions are too broad.
Citizenship is an issue, they should not be on council or vote until they are a permanent resident. Not sure how LL meshes with PTech. APEGA should not be in the education business, but would encourage other ways to retain the option of student registration.
Citizenship should not affect governance of profession but members must have active practice in AB to qualify. MITs bring unique perspectives. APEGA members should not be allowed to be part of unions.
Citizenship shouldn't be seen as a distinction. LL- too many designations and attempts to pigeonhole everyone. Avoid temptation to create individual scope of practice on a case by case basis- far too administratively cumbersome. The industry has many standards and codes, the engineer is responsible to follow them and the act can't reference everything.
Citizenship status is not important if a person meets the professional requirements. No to MITs on council. If someone wants to apply they should have the degree already and not take 20-40 exams.
Concern about "bought" degrees. Important to keep difference between PL and PTech clear.
Concern about FLIC accountability.
Concern about FLIC liability- eg design failure when a member lives in another country. LL simplifies things. More discussion around delegation needed.
Concern about larger foreign interests having ability to vote, may lose local focus. Better alignment between ASET & APEGA is important. Delegation needs more clarification.
Concern about PTech who moves to LL will have opportunity to practice on highly complex problems. It's inappropriate that someone can say "my application for professional designation has been in process for 20 years." If continuing the student category, set a limit of 5 years.
Concern about removing accessibility when student category is eliminated. APEGA must be involved in building code legislation.
Concern of safety of public with member not living in AB.
Concerns about FLICs running for council. MITs should have a dedicated spot on council. Experience- gaining 4 years of experience with an 8 year time limit is too lax. Scope of LL would need to be very clear.
Concerns that the word "limited" would sound like it is lesser than a P.Eng. Concerns that people like comp sci students would not be able to write exams and become P.Eng.
Current FLIC status does not align with global trade agreements or needs. Removing student category will reduce volunteer and admin hours.

Delegating authority removes bottleneck and speeds up work of APEGA. Delegated person should have required qualifications.
Delegating authority will free up Council time.
Distinction should be made for FLICS due to knowledge of local practices, standards etc. MITs do not have experience to make decisions. Should get to vote but not be on council, but do agree with the MIT designated seat on council idea. Creating a new LL category only creates more confusion and opportunity for misunderstanding.
Do not believe there should be non voting members. If they practice in AB they should be allowed to vote.
Do not create LL category and eliminate PLs. They should be P Eng or PTec.
Doesn't think changing the FLIC designation will change the profession. There must be a better way to get MITs involved.
Don't change to LL designation, PL is fine.
Don't eliminate student category entirely, but put strict qualification criteria on who can be eligible.
Don't like the negative connotation in using the word Limited. Use Specialized License instead. Student designation gives false hope.
Eliminate FLIC and use P.Eng but limit voting rights. MIT should have a dedicated seat on council and should get extensions in certain circumstances. Need a degree to get a professional designation. No APEGA U, reduces admin.
Engineering is a global profession. Segregation based on citizenship is outdated. MITs do not understand their professional responsibilities yet, so should not be on council. Too much power is already being delegated to staff without council oversight.
Extending MIT times would make their experience out of date. APEGA needs to open a door to the professional candidate with a diploma- keep the student category.
Extensions should be granted, but gaps in experience history should be considered. MITs should be able to participate more but should be limited to only one person on Council. LLs should have exams assigned to determine scope of practice.
FLIC concerns about foreign members not having the same values or knowing Albertan safety codes building code etc. LL proposal is not clear. Building code proposal is good because the ABC is updated more than the EGPA.
FLIC- concerns about legal powers of disciplining members in other parts of the world. Do not want FLICs on council. MITs should be able to vote but concerns about them being on council. LL further engages ASET in regulating their members. APEGA must take responsibility for the sections of the building code that intersect with professional practice.
FLIC designation should not be changed. No need to create a new LL term.
FLIC- fix confusion with public but leave the governance alone. If MIT doesn't have experience to be a PEng, then they don't have the experience for council.
FLIC members do not know the local system or environment. Student category- these people should just apply for PTech. Agree that authority should be delegated but not sure who it should go to.
FLIC status brings up issue of public safety if the person can't be persecuted by Can legal system. MITs should become professional members before voting/council. Extend the 8 years but have it reviewed by BOE.
FLIC status should be kept so people are encouraged to get their Canadian residence. Cost for APEGA to provide exams is not justified.

<p>FLICs being able to vote is not in the best public interest as they dont know about local codes and business practice. MIT unique circumstances clause should be added to act. Good to have a distinction between ASET/APEGA. Eliminating student category would potentially ban people with relevant work experience/education.</p>
<p>FLICs- it is important to have Canadian industry experience. Reduce MIT experience to 6 years. Council should be limited to professionals. LL designation will create confusion. Duplicates of building code will cause confusion.</p>
<p>FLICS should not be able to run for council. MITs can vote but not run for council.</p>
<p>FLICs should not be able to vote or be on council. Give MITs a dedicated seat on council. APEGA is not a university. Cannot delegate authority, only administrative duties. Acts other than the building code affect engineers and should be considered as well.</p>
<p>FLICS should not be allowed to vote. Ensure APEGA still has input into building code changes.</p>
<p>FLICs should not vote. MIT experience over 8 years is likely outdated. Need to raise issue of accreditation. Remove all reference to Alberta Building Code, it is an implicit requirement. Professionals are responsible for compliance & the environment changes faster than the Act.</p>
<p>FLICs should vote but not be on council. Student category should be removed- there should be a universal standard to apply.</p>
<p>FLICs shouldnt be able to vote in APEGA if they can't vote in Alberta. LL- If they can't be a P,Eng they shouldn't hold a designation. Don't eliminate student category but make it more difficult to enter. People like Henry Ford should be able to get a designation.</p>
<p>FLICs that are registered with APEGA should have same rights as resident P.Eng.</p>
<p>For student category, review cases, but send them back to acquire resources.</p>
<p>Foreigners should not have any influence in Canadian legislation should not be allowed to vote. MIT timeline exemptions should be made but reviewed on a case by case basis. LL provides clear distinction from PTech. Building code should be the minimum requirement but an eng should have the options to substitute as long as it meets intent.</p>
<p>Giving young members some privileges would be good. Extending experience time would need to be on a case by case basis. Extensions may remove incentive to obtain PEng. LL designation sounds too close to the law degree LLB. No value to providing student reg.</p>
<p>Governance should remain local and require citizenship. 6-8 years is plenty of time for MIT experience. LL- need to develop a clear and regulated system with ASET. Concern about delegating authority means APEGA will also contract out responsibility.</p>
<p>Have Council support MIT volunteer options for APEGA involvement.</p>
<p>How is a member held accountable if they are residing in another country? MITs should vote but don't have the experience for council. LL should have to be supervised.</p>
<p>How to regulate FLIC at a distance?</p>
<p>If a FLIC is living outside of the country it would be very difficult to bring them under AB law. Get young engineers involved. Dont thing PL to LL would make a difference.</p>
<p>If a member pays dues they should be able to vote (MIT).</p>
<p>If a person doesnt have enough qualifications to get a P.Eng of P.Geo there is no point to give them a LL. Too complicated to define their scope. Having an eng degree is a must, APEGA shouldn't have student category or set exams.</p>

If a person exceeds 8 years as an MIT, they should be reviewed. Recommend Specialist Licence instead of LL.
If an APEGA member is working overseas how does APEGA monitor compliance etc?
If member is not a Canadian citizen they should not get to vote or be on council. MITs do not have enough experience to make informed decisions. Removing PL removes people with a vast amount of experience. Removing the word professional would confuse the public more. If APEGA keeps the PL designation the special student could re require to take that path.
If people live outside of Alberta for x number of years they should not be able to vote. OK with MITs voting after 2 years experience but they should not be on council. Dont abandon people who would have gone the special student route, provide other avenues.
If you can practice engineering, then you should have a vote on practice issues within the jurisdiction. MITs should be able to apply for an extension if needed. Having a seat for MITs on Council would be good to speak to issues specific to MITs. Applicants should have a full post secondary degree.
Important to get more members involved earlier in their career. MIT should have their own seat on council.
In favor of reducing restrictions based on citizenship status. Extending MIT status a good idea, but may create the need for an appeals process when extension is not granted. Student status is large administrative burden with low success rate.
Including MITs on voting would increase percentage of voters participating. Should only have 1 seat on council. LL will eliminate confusion. Concern about current PLs who dont have a degree. Eliminating student category would be unfair for those working in the field for several years but lack academics.
Increase MIT engagement early in career. Not sure about a dedicated council seat. Workshop did not discuss Calgary MIT union issues. Streamlining all processes is beneficial.
Instead of LL, how about LPEng? Delegation needs review and clarification.
Internal governance needs to be restricted to Canadian citizens. LLs must be required to disclose limitations to clients.
Issues with FLIC proposal- liability, no Canadian taxes, no bilateral reciprocity. LL needs more clarification. Delegation needs a framework.
Keep FLIC designation as it is. Governance should fall to Albertans only. MIT should get a designated seat on council. LL- if a person doesn't qualify for professional membership, they should become an ASET member.
Keep PL designation, but change the rules around scope.
Keep student status to give people the chance to practice to become a professional.
Let MITs vote but not be on council. Act must not contradict building code.
Letting MITs serve on council eliminates discrimination against them. LL designation separates PTechs better.
Licensee - reduces complexity and confusion. It is analgous to a PEng/PGeo is so far as professional practice is concerned. This is an additional designation is unnecesary. Name change is unfair to discriminate based on country of origin as qualifications are met for PEng. Right to vote - why shouldn't they vote? MITs-Agree with letting MITs run for council. The members decide who is best to represent them. Disagree with letting MITs vote - they have not met requirements for professional licensure. Why should they decidse on governance of other professionals? The 8 year limitation for an MIT is arbitrary. There should be a limit on the timeframe to be an MIT, but I cannot say how long that should be. If someone has had a significant time delay in becoming an MIT to applying for P.Eng/P/Geo they should have sufficient reasoning to become a P.Eng this reasoning should be regulated. If more youth are wanted in governance, reduce the number of years required to be spent as an MIT. An MIT could run for council but

only be elected (not acclaimed)

P.L.-agree with the changes to scope of work. Disagree with the name changes as there is no reason to change PL to LL. That adds confusion.

Student-I think the system with the student designation is broken/not working well. I am not sure eliminating it is the best option. Concerned with defaulting to our universities to determine who qualifies to apply to APEGA.

Authority to Delegate - similar to permit to practice delegation structure. Need to ensure legislature structure is in place to have responsibility and accountability of responsible person(s) involved.

Building Code - clarity and consistency is paramount. Best to reference the source.

Licensee - right to work no - right to practice Engineer Yes if they meet the conditions.

MITs - I agree that MIT can vote. Disagree they can run for council, until Ethics is approved or really called "Engineer"

PL-APEGA should be regulating Engineering and the practice of. P. Tech is more the operation of Engineering. The term limited licence is a good thing. The grandfathering is a good idea.

Student-fully support APEGA is to regulate engineering, not educate.

Licensee - the cautionary comment, could this open up APEGA to foreign governance.

MITs - would it then be possible for the President of APEGA to not be an engineer; ensure act maintains P. Eng, P. Geo, MIT balance. Voting ok. It is a disservice to the public to eliminate EIT/GIT and add MIT. Maintain EIT & GIT.

PL - maintain and enhance demarcation between APEGA and other organizations ie ASET, so that in general APEGA requires or Eng. degree to qualify as a PEng. Work towards eliminating the various non P.Eng designations, let not be a "be all" and regroup all these various tech, diploma etc categories.

Student-there is ample opportunity for talented individuals to return to University and follow a track to a degree. Universities offer numerous distance, evening and weekend being options. Bottom line, the price to pay at the door to enter the dance hall is an engineering degree from a reorganized program.

Authority to Delegate- clear parameters need to be established.

Building Code - I don't see how eliminating this allows APEGA to govern its members.

Licensee: foreign trained applicants do not often know background behind governance. This is needed.

MITs: You could use an inactive category and limit the period of time of inactivity

P.L. APEGA needs to sort out how to qualify applicants competency based selection is needed. Question: How far has APEGA gone on company based selection criteria?

Student: You have to find a way of dealing with polytechnic graduates

Authority to Delegate: if there is a delegation there needs to be quality central "authority" BCC: should this not be a uniform safety act? Question: Will APEGA honour the response of regulator?

Licensee: Profession should be considered on the basis of education, skill, and experience along with APEGA ethics

Student: It make sense to serve hours and effort of Board of Exams

BCE: to accommodate improvement in the BC with the time and requirements.

Licensee-applies great for individuals who maybe are working under contract, coming from another county and are will to

become APEGA members

MITs-Allows MITs to become more involved with APEGA. I think the time should be extended to allow them to overcome different circumstances in their carriers.

Professional Licensee-The proposal make sense and allows individuals with different years of studies and qualifications to apply to appropriate delegation.

Student-The special student category elimination it makes due the different pathways to achieve their career.

Authority to Delegate-if helps improve APEGA structure and organization, yes it should be done.

Building Code - not working with ABC but agree to reference the current ABC.

Licensee-profession should be considered on the basis of education, skill and experience along with APEGA ethics

Student-it makes sense to save hours and effort of Board of Exams.

Building Codes-to accomodate improvement in Building Code with the time and requirements.

Licensee-should be be a differentiation between Canadian and not Canadian Members.

MITs- agree about extended or eliminating the time period for MITs, however I do not think that MITs should vote or run- they should be learning.

P.L.s-LL is great for international people/members.

Student-APEGA should not be managed/assigning/ccordinating eduction. better to promote people to get more globally accepted eduction, they should not only strive towards meeting APEGA's requirements.

Building Code-public safety first.

Limit FLIC influence on council. Do not allow MIT extensions as it doesnt give incentive to gain full membership.

Limit number of MITs on council. LL proposal confusing. Student proposal very practical. Engineers need to participate in building code management.

Limit number of MITs that can be on council but it would be good to have higher engagement. Liability issues if a FLIC leaves Canada to avoid lawsuits.

Limit the amount of time an MITs work experience is valid for. Is LL designation really required? Aren't P.Eng already self limiting? Delegation needs more clarification. Simplify in all cases of new proposals.

LL is an improvement but is still too convoluted and complicated.

LL is too confusing. There are too many categories of membership already.

Student category- should follow the US format.

LL- keep the title the same, but increase the experience level required for PL to 10-12 years. The public will be confused with the term "limited".

LL makes designation more clear. Need more clarification around delegation.

LL- remove this designation. Either become a PEng/Geo or an ASET member. Delegation is a necessary evil and must be done appropriately.

<p>LL should have a limited timespan so that after 10-15 year it can become professional status.</p> <p>Authority Delegation- delegate work but not responsibility.</p>
<p>LL should not be added, people who fall into this category should become ASET members.</p>
<p>Make designations more simple. People will be confused between PEng PL and PTech.</p> <p>Building Code- everyone should just follow CSA standards. APEGA can change EGP act.</p>
<p>Make sure FLICs are not influencing governing body. Add specific MIT seat to council.</p>
<p>Makes no distinction between Canadian PEng, NAFTA US engineer or anybody in the world. LL name is not a good choice. There should be no dual legislation addressing the same thing.</p>
<p>MIT extensions should go on case by case basis, not as a general rule. LL will eliminate confusion.</p>
<p>MIT have long been waiting to engage with APEGA in a more substantial way. Allow one seat on council.</p>
<p>MIT- maybe have a prerequisite or have a reference from P. member to run on council.</p>
<p>MIT should get a seat on council but shouldn't be able to run for president. Experience extensions reviewed on case by case basis.</p>
<p>MIT should not be able to be President of Council. Remove MIT 8 yr rule and review on case by case basis. Current PLs might not like the word Limited in their title. Student category is an administrative burden.</p>
<p>MIT should not be allowed to run for council but should be able to vote. Stick with 8 year rule. Delegating authority would help save time and money.</p>
<p>MIT will be able to feel like a full contributing member.</p> <p>LL will clarify designation.</p> <p>Removing student category is long overdue.</p> <p>APEGA should require members to use latest edition of building code.</p>
<p>MIT: better opportunity to engage the MIT contingent in governance of the regulating body.</p> <p>Prof. Licensee - simplifies.</p> <p>Student - great re-alignment to simplify categorization. Also removes APEGA from "education" duties and leaves capacity for "regulation".</p> <p>Building Codes - should always point to most relevant source of data.</p>
<p>MITs dont have enough experience to run for council or vote but should have a platform to have their voices heard.</p>
<p>MITs need more experience before they can vote. LL will create more confusion instead of reducing it. Delegation- need to specify who monitors liability.</p>
<p>MITs need more experience.</p>
<p>MITs need more experience. LL makes public better informed and protected.</p>
<p>MITs need to choose their path as a professional first and then they can be more involved in legislation. There should only</p>

<p>be PTech or PEng. Student category is ineffective and expensive.</p>
<p>MITs need to develop knowledge and experience before being asked to take on responsibilities. Certain things should not be delegated. Needs to be developed much more.</p>
<p>MITs need to have certain experience requirements before being allowed on council.</p> <p>Concern about who authority can be delegated to.</p>
<p>MITs running for election without proper experience is harmful to public welfare.</p> <p>PL- People with diplomas and a lot of technical experience will not get to talk to APEGA only because they have degree.</p> <p>MITs should be able to run for council but not the executive committee.</p> <p>Agree with LL designation but the public may be confused.</p> <p>Efficiency in APEGA needs to be improved.</p>
<p>MITs should be allowed on council but should have at least 4 years of experience.</p>
<p>MITs should be encouraged to be more involved, should have 1 seat on council.</p> <p>Student category is confusing, but exceptional people should still have a way of becoming members.</p>
<p>MITs should be encouraged to move to Professional status as quickly as possible.</p>
<p>MITs should be focused on getting their professional designation and not waste time on other involvements.</p> <p>Delegate duties but authority must remain with APEGA.</p>
<p>MITs should be involved but shouldn't have influence over professional members. Examine experience on case by case basis.</p>
<p>MITs should be involved earlier.</p> <p>LL would simplify administration. Opportunity to become a PEng by exam only should remain accessible.</p>
<p>MITs should be involved, but have only 1 seat on council. Why have MIT category at all?</p> <p>LL name confusing, would need to educate public. Enforcement an issue.</p> <p>Current PL structure already works.</p> <p>Concern about delegating authority to employees of APEGA. Suggestion to have council meet more often or have more people on boards.</p>
<p>MITs should get a designated seat on council but shouldn't get to vote.</p>
<p>MITs should get a designated seat on council.</p>
<p>MITs should get involved but voting privilege should be limited.</p>
<p>MITs should only remain as such for a limited time.</p> <p>LL will eliminate confusion.</p> <p>MITs should pass an ethics exam before they can be on council.</p>

LL- Many smart and qualified SAIT and NAIT grads that will be eliminated if this category is.
MITs should vote but be limited on council to one person. LL issue still unclear.
MITs should vote but not be on council. Extensions should be reviewed on a case by case basis.
MITs voting is ok, but they don't have enough experience for council. LL puts a lot of weight on determining if education is "engineering" or "technical". Any delegation must be carefully overseen- recommend use engineers.
MITs would bring a new point of view to council but should be restricted. APEGA should only accept applications from degree holders. Instead of delegating, encourage more people to participate on boards.
MITs would bring fresh perspectives to council. Delegation responsibility must remain with council.
More inclusive governance will help APEGA improve responsiveness and adaptability to the evolving business environment. Move to competency/activity based eligibility for MIT designation. Grounds for PL title change not comprehensive. Current student category is ineffective, alternative membership path must be provided. Improve alignment of building codes w EGP. Remove procedural & legislative redundancy that created opportunity for discrepancies and confusion.
More names of categories just adds to the public's confusion on the definition of engineer/geoscientist. You either are qualified or not. No LL, put them into full P.Eng or into PTech category. APEGA should have a set of standardized competency exams that will determine if they can move to the next level or need more education.
Must have citizenship to be on council. Keep PL designation. Look at people's masters and PhDs as well.
Must not limit the voting rights of foreign engineers. Review circumstances for MIT extension. MIT Council seat should be created, voting rights should be granted. APEGA should not be a university. Accountability must still remain at point of origin re authority to delegate. Building code- should never duplicate information because it leads to contradictions.
Need more clarification on LL designation. Student category doesnt apply to current needs of the province.
Need more clarity around delegating authority.
Need to have a clear distinction between FLIC and PEng. MITs do not have enough experience. Building Code needs more specific information to the people who use the code.

Need to identify members who are not residents of Alberta. Suggestion- FPEng.

MITs should have a dedicated seat on council but not all seats should be open to them.

Approve of the word "limited".

Non resident members should not be allowed to influence governance.

MITs should be able to vote but dont have the maturity to be on council. 8 years is plenty of time to gain experience.

LL eliminates confusion.

Administrative tasks are taking too much time out of council/boards/registrar, authority should be delegated.

Non-residents should not get to vote. MITs should have a seat on council but not vote.

Not all FLICs have a commitment to contributing to AB society, prefer that this designation remains and limits participatory rights.

MITs dont have the experience to make decisions on council.

Delegate duties but not authority or responsibility.

Not sure of the advantage of LL over PTech.

OK for MITs to vote with some restrictions. Shouldn't be able to run for council.

LL is a good clarification of terminology.

Only Canadian citizen should be able to change APEGA governance. Maybe have designation as PEngF.

Only citizens/ permanent residence should be able to be professional members. People without an eng degree should go to ASET.

Delegation should not happen due to quality assurance.

People who aren't Canadian citizens shouldn't be able to vote on governance issues.

Engaging MITs ensures fresh ideas. Suggest title of Junior Council Member.

ASET should better serve PTechs so APEGA doesn't need the LL designation.

Don't fully eliminate student category- some highly educated people should be able to contribute to the profession.

People who have not worked in Canada may not understand safety of public, bylaws, provincial laws.

MITs opinions must be considered but without considerable experience it is impractical for governance.

PL designation should be eliminated and LL would just cause more confusion.

Prof Licensee - agree with the name change. Would like an option for techs to remain. With a policy encouraging techs to go to ASET.

Professional Licensee - streamlining is good, but this does not go far enough. We need to have one association for engineering and engineering technicians. Government has forced one act model, but that is cumbersome, confusing and inefficient.

Student - the second category are not students. If they choose to go back to school they will become students. If not, they

are applicants who have been assess exams to prove their competence.

Authority to Delegate - just do it.

ABC - avoid duplication leading to possible contradiction.

Qualifying and enforcing a Limited Licence designation might be a challenge. Resources put into student category can re-allocated.

Delegating authority will help to greatly reduce wait times esp BOE.

Removing student category would set an obstacle to many candidates from overseas or other areas.

Restrict FLIC influence on council but they should get to vote.

Limit number of MIT on council. APEGA shouldn't be in the business of education.

Review MIT extensions on a case by case basis.

Run a risk benefit analysis on MITs being part of Council.

Need more information on LL designation.

APEGA should be involved in the building code process.

Set limit to number of MITs on council. Work on LL name so it is clear but not condescending.

Should be a distinction between a citizen and a temporary resident. Delegating authority would improve flexibility of committees.

Simplifying FLIC title makes sense but they should not be involved in governance.

LL designation will be more clear to the public.

Delegate admin but not authority.

Some specialize eng disciplines cant obtain relevant degree ie. instrumentation, automation. People with tech school background & experience are more qualified than many with Eng degrees. After 10 yrs experience is much more relevant than where the person went to school.

Student category- need to have a mechanism for allowing people to challenge educational req's. Outsource challenge exams to universities.

Student category- APEGA should still administer exams.

Student designation is an anachronism from the 1920s.

Suggestion to use the work Specialist instead of Limited for new LL.

Take a vote on if FLIC members should get to vote.

There should be no MIT time limit.

LL should only be given under exceptional circumstances.

Same goes for student category.

APEGA members should still be involved in ABC.

Technologists should apply through ASET and become PTech.

Student category acts as a loophole. People who would previously be in this category should go through new LL.

Delegation needs to have specific policy and framework.

The section on delegation of authority is too broad to express a single opinion. There are some items that certainly can be delegated, but others that cannot. Details of proposed legislation would be needed to express a detailed opinion.

The word limited has a negative connotation. Leave as PL.

The workshop only raised a whole new set of questions and confusion. Non Canadians should not get PEng designation. Concerns about foreign influences changing Albertan policy.

Transitory people should not be allowed to practice in Canada.

Delegation should remain with APEGA and not external.

Uncomfortable with the implications of having governance by those who have not been screened for citizenship.

MITs should vote but not be on council. Reduce experience to 6 yrs with a 2 yr extension if required.

Concern that LL is just the same as PTech qualifications.

Unfair that someone with a tech diploma could get a PEng.

Value is established with community when prof. member is a citizen/resident. Leave FLIC designation as is so public is aware of the difference.

Appendix 4 – Verbatim Comments From Emails and Champions Collaborative Events

The following feedback is from emails. The comments have not been edited.

I would like to take the opportunity to provide some feedback on the proposed legislative changes regarding the engineering profession. Specifically I would like to provide feedback on the changes regarding student membership. I do not believe that getting rid of the second student membership category is in the benefit of APEGA or the people we serve as professionals. I have come to this belief because:

- I understand that at least 2 members of APEGA became professional members through this second route that would not have otherwise not joined our ranks.
- Universities are distinct entities with priorities and objectives that do not / will not always align with that of APEGA. Giving universities a monopoly on who can and can't be an engineer could create future challenges and hamper APEGA's ability to self-regulate.
 - Some examples of possible disadvantages of universities are: They are expensive and may only be accessible in the future to the middle class and rich (or just the rich); They discriminate (allow enrolment based on a person past academic performance not base on their current ability or potential); They can contribute to the lack of diversity of personality types, gender and minorities in our fields by only being able to cater to certain learning/teaching styles.

In recognition of the burden that keeping this second student category places on APEGA's administration staff I would propose creating a higher bar for acceptance of student members under this second category. An example of a higher bar would be requesting applicants to pass the PE exam in their desired field of interest before being granted student status (this could be considered similar to an MCAT or LSAT exam).

Thank you for looking for and considering feedback on the proposed changes.

I attended one of the seminars about the proposed legislative review last month. From my understanding of the material presented, most of the legislative changes proposed are aimed at increasing the number of APEGA members from foreign workers who do not currently qualify.

It seems to me that by doing so would vastly increase the requirements for member volunteer time and admin staff cost in committees charged with reviewing credentials of such workers. Therefore I am opposed to these changes.

I was of the impression that there would be more opportunity for comments, but it seemed limited in the survey. Is there another place for comments? I am providing my comments in this email in case there is no other mechanism.

Licensee – Understand the one designation, but would prefer that someone need to reside in Alberta to be able to run for election (they would not have to be an actual citizen, just reside in Alberta during their term). Could this maybe be added to some rules around the eligibility to run for Council?

MIT – Agree, but would suggest the potential for a specific MIT chair on the council or that they are only eligible for member at large and not president.

Professional Licensee – I still think there is a big difference between the scope of practice of a PL versus a PTech that will be lost with this change. I do agree with the ability to provide non-Canadian engineering or geoscience degrees the LL with the opportunity for full PEng after certain exams. However, I am confused as to why a Masters or PhD in Engineering doesn't automatically provide you the PEng route with a few exams (i.e. Fundamentals of Engineering). Usually the person has a somewhat related undergrad degree just to be able to get into the graduate program.
No comments/issues on the remaining topics.

I have a question that deals with a fundamental issue that is controversial. I am not sure if APEGA would want to deal with it or not. That is should APEGA be involved in indicating what services and financial resources should be made available or provided on engineering projects. Until 10 years ago APEGA and AAA provided a guide to do this. This was discontinued because of concerns with the federal competitions act.

A similar discussion went on in British Columbia and after a rigorous review by the competition bureau the federal Government found that the wording in the Fee Guide in British Columbia was acceptable because of the wording in the Architects Act in BC.

Would APEGA consider using appropriate wording in our act? My reasoning behind the request is the following: My observations since 1980 one of the leading causes of endangerment of public safety is inadequate financing of professional services on a project. This shows up in potentially inadequate levels of services.

When Guide line 11 was in place there was a benchmark for owner's groups to follow or at least know that they risking public safety. Presently there is a guide put together by the CEA and CAA, while this guide is a good reassurance, not following the guide does not carry the same potential consequences as in the past for APEGA members.

Present wording of the of our ACT does not allow APEGA to protect "public safety". To me this is much more important than changing the definitions discussed in round table.

Our firm was actively involved in development of the fee guides between the CEA and CAA. At the time the question was raised with APEGA staff whether representative services needed to be identified for projects in the PRB APEGA staff said this was not possible because of the competitions act. In BC the same challenges were identified but the wording of the Legislation in BC for the Architects allowed this to be done. That is why I have raised the question during this legislative review.

I also point out that Court system (Court of Appeal BC) has identified a responsibility of owner groups to show due diligence when selecting consultants.

1)Licensee: Yes, I partially agree to the suggested recommendation. I think it is important to have Canadian industry experience to practice here in Canada. I also think it will be safe and beneficial to have someone with permanent residential status and or citizenship. Knowing someone has gone through those processes will allow us to confirm that the person has gone through intense security check.

2)Member-In-Training: No, I do not agree. The privileges must be limited to trainees and professionals. The term a person can remain could be reduced to 6 years. I believe 8 years is too long.

3) Professional Lincensee: Yes, I agree to the recommendations #1. Too many designations will only cause confusion and will increase work load of the associations for unnecessary reason. Only P- Tech should be kept and assigned/used. I do not agree to recommendation #2. This will only create confusion. Only qualified individuals should the designations and that is it. Limited Lincense will create vagueness and open loop holes.

4) Student: Yes, I agree to the recommendations. No special student category should be in place. I also believe a professional engineer must have engineering education background. Those that don't have the education can have the P. Tech designations.

5) Authority to Delegate: I am not clear of this so I have I have no suggestion but I do believe it is important for APEGA Council need to have certain level of authority.

6) Building Code Exemptions: Yes, 100% agree to the recommendation. There is no need to re-write what is already written. Have duplicates will cause confusion and may even result in accidents as the association may fall behind the code updates. Let use only 1 code that is being issued by the industry itself. We as a association can suggest for modification or edition to the list of codes if need but we all should only refer to 1 code.

I very much appreciate you consideration of my opinions and hope what I wrote here will be beneficial in the process of this review.

I have one suggestion with regard to the Checking of Engineering and Geoscience Work Requirements. In my opinion, this is an essential step to provide confidence that appropriate quality checks are performed. For example, APEGBC has issued the "Documented Checks of Engineering and Geoscience Work" in Feb. 2013, please see attached. My suggestion for APEGA is to consider the issuance of a similar document or, these specific requirements may be incorporated in the "Guideline for Professional Practice".

I have an extended experience related to the writing of standards, policies and procedures and I would volunteer for this

specific purpose, if required.

I attended today an information session related to the Legislative Review of the EGP Act. If I understand correctly, the scope of my comments below will fall outside the scope of the legislative review, as the Act itself has a very broad definition for the practice of engineering, but that interpretation of the EGP Act falls under the published guidelines prepared by the practice standards committees.

My interpretation of Section 2.4 of this Guideline is that the design of SCADA or PLC systems is intended to be part of the practice of engineering, but it is not clear, and certainly not consistently practiced in industry, that the programming of this software/equipment also constitutes the practice of engineering.

I have been witness to a variety of practices, typically based on what each market sector is used to. Some industries (eg. high voltage power utilities) will require a professional engineer to authenticate the program documentation while others (eg. municipal water treatment) may only require an engineer to prepare a "Control Philosophy" document, while the program of the control system itself is rarely documented. I believe that the programming of control equipment can be completed by a variety of trained personnel, but that APEGA's guideline should recommend that the software code (ie., the setpoints, logic descriptions, graphical code, or process instructions) be documented and approved (authenticated) by a Professional Engineer.

Perhaps this is something to be reviewed as part of the next update to the *Guideline for Professional Responsibilities in Developing Software, V1.0 (Feb 2006)*?

Thanks for your efforts to clarify.

Important to keep 1 year qualification for Licensees to make sure they are really aware of practice here

Question: if a person is already an MIT whose time has run out, are they grandfathered with the new legislation?

Re giving M.I.T.s voting rights – would it be a good idea to "shore up" qualifications for different council members ie MIT vs. P. Eng. Perhaps have a designated member of the council be an M.I.T. and consider geographical area (one from north, one from south).

Good idea to have M.I.T.s have a vote – great to be involved earlier – makes you feel more connected and promotes connection for career (comment from M.I.T.)

Professional Licensee (P.L.) – definition and clarification of scope needed (NOTE: a few found the diagram confusing despite clear explanation). Should have a registry that is easily accessible regarding P. Techs

Confusion regarding APEGA and ASET - need to be more clear on who has charge of what

Changing the name and taking away the name professional muddies the waters even more – leave professional in the name. Take out "limited" - also confusing. Lengthen out the time needed to be able to get the designation (i.e. more post-secondary education and/or more years of experience)

Will there be a split between foreign P.L.s and P.L.s from ASET – if APEGA gets rid of the P.L. will there be a deluge of ASET P.Techs applying for P.L.s.

Special student category – keep exams as there may be qualified people who can't afford going to the university.

Building Code proposal – no comments.

1. Authority to Delegate

All we're doing here is to explicitly state in the new act that Council, Registrar, etc have the capability to delegate their powers to other members, as appropriate. These other members may be P.Eng or P.Geo or MIT or LL or P.Tech or any other class of member, because once someone is allowed into the APEGA fold, there should be no 2nd class members. I support this proposal.

2. Building Code Exemptions

I've heard the reasons why there are sections of the building codes inside the EGP act. I would agree with the proposal to eliminate them. By adding a statement such as "all relevant codes must be adhered to", APEGA would cover itself while providing maximum flexibility for future revisions of this act.

3. Members-in-Training (M.I.T.)

I find the term MIT to be more confusing than what it is replacing and I hope that the term MIT is just for this discussion only. EIT and GIT are terms that are specific to engineering associations, while there already exists a much more famous MIT from somewhere in the northeastern USA. Technologists should not need training, so we should not have to worry about coming up with an acronym for them. I fully support allowing MIT's to vote and hold council seats. There should be no 2ndclass members of APEGA. There should be controls in place that would limit the number of MIT's that can be on council at any one time, but if you can find a hot MIT who wants to be involved in the governance of APEGA, you should do everything you can to facilitate their commitment, because it doesn't happen very often, even among professional members.

4. Professional Licensee (PL)

I agree with the concept of the LL and that all existing PL's be "grandfathered" into the LL designation. However, what is the defining difference that separates a professional from a technologist. If it's education, then anyone who does not qualify to be a full professional member should fall into the P.Tech designation. I realize at present the P.Tech designation is a very specific designation referring to a very limited class of engineering technologists who come to APEGA through ASET. In my opinion, the P.Tech designation should be expanded to include anyone whose education is at least two years in a related field that does not qualify them to become a full professional member. Now because of the legislation enabling ASET, you may not be able to call them a P.Tech and maybe you will have to come up with a new designation, but the APEGA that I would like to see going forward is one that has only two main categories of membership – professional (P.Eng or P.Geo) or technologist (P.Tech). If you feel that you must have an LL designation, I would strongly suggest that it only be applied to individuals in a unique set of circumstances. The majority of new members should be accommodated within the P.Eng, P.Geo or P.Tech framework.

5. Licensee

I strongly agree with the proposal that qualified individuals may be registered as professionals (P.Eng, P.Geo) regardless of Canadian citizenship or permanent resident status.

6. Student

I think that this proposal along with Professional Licensee proposal are the two most interesting aspects, so far, of this review process and the two proposals share some of my concerns. I agree that the special student category be eliminated. When you have a student coming out of an engineering or geoscience program with a 4 year degree, they would proceed into a professional pathway, either as an EIT or GIT. But what about the individual that does not have a 4 year degree, but a 2 or 3 year diploma from a technical school or a university, say in environmental sciences? I would strongly support a broadening of the P.Tech designation to allow individuals with education in a related field that does not qualify them for professional membership to be able to gain APEGA membership as a P.Tech.

Now this topic came up for discussion this morning at the legislative review. It was suggested that P.Tech, as it stands today, is a designation that is only applied to a very specific group of engineering technologists and is a program deigned between ASET and APEGA. But it only applies to about 500 individuals, so that there are about 17,500 other technologists who are members of ASET that at present desparately want to become members of a professional organization so that they could get professional signoff within a limited scope of practise. I know many of these individuals and I know that my comments are in line with their career expectations. They are so desparate for professional that they have had to invent their own sets of initials, like CET, CEP, etc.

So, is there some mechanism whereby APEGA can expand the P.Tech designation to allow members of ASET to apply for membership in APEGA at a technical level? Other professional associations already have accommodated technologists, including foresters, who gave the techs their own organization, and agrologists who simply included them within the association. My concern is that there are 17,500 individuals who are mostly in the environmental industry operating without any code of ethics or enabling legislation. What does this say for protection of the public? In my opinion, it would be far better to have those individuals included in APEGA as P.Tech's than to have them operating at large.

Once accepted as a P.Tech, the individual could still pursue professional membership through the exam pathway or they could spend the rest of their working career as a P.Tech with a restricted scope of practise. That choice is entirely up to them. But by broadening the P.Tech designation to make it more inclusive, APEGA would be fulfilling its primary objective, protection of the public.

I have one major concern about foreigners certified engineers:

They can be pressured by their organizations to stamp engineering drawings and documents, regardless of their quality. I have worked for foreign owned EPCs, who use "high value" engineering centers. The issue is not around their technical skills, nor even their personal ethics. The issue is that in most organizations that originate offshore -(American, UK, Italian, Indian, Chinese, Indonesian, Filipino) the individual engineer had less respect and autonomy than in Canada. I have also experienced some issues in Canada as well, but I found there was a fear of litigation or liability, both by the individual engineer, and by the organization, that helped balance the issues.

In Canada, I have personally been asked to stamp drawings that I was not qualified to stamp, by a Italian project manager. In another instance a civil lead that worked for me was asked by a American PM, to stamp an incomplete drawing, simply to meet schedule. In both cases the drawings were stamped by the appropriate engineer, only when they were correct. Because there was a critical mass of Canadian engineers in both instances, I was able to protect the organizations from their own shortcomings.

I recommend that you support any foreign certified engineer, by placing significant penalties in the the organizations that they work for. (Loss of PTP, litigation, etc).

Also, I would NOT remove the designation of Foreign Certified professional engineer. I will help remind the individual, his/her organization that they have an obligation to understand and observe all applicable codes, standards, and ethics. These observations are from my experience as a Project Engineering Manager for large (500k work-hour) projects, that had local and offshore work. This view is from the trenches, and it's very different from an idealized world, where everyone has the luxury to behave ethnically, without fear of reprisal.

I was sitting in the legislative review on Monday June 22, 2015 in Calgary, AB and had a few very concerned comments that needs to be addressed. As I sat through the presentation, I have noticed that the general trend of the association in this review is to open up and allow for foreign licencees and other perspective members to more easily achieve our professional membership whether P.Eng or P.Geo or otherwise.

Here is my question at the meeting that was never really answered. **Has anyone completed or done any research on restricting the number of members in our association?**

There are several reasons I am bringing this up. I will list them below:

- 1) In Alberta, we are heading into the second recession in less then 5 years. Already, there are plenty of engineers without work. If we continue to inject more people into a already saturated labour pool, nobody would benefit from this situation.
- 2) I am not against foreign licencees or am against people of minority or otherwise. I myself was born in outside of Canada and move here when I was 5. Having said that, I want to state that there are problems/issues with foreign licencees. Because some of them have worked in foreign countries prior they have being trained with different ways of doing things then in Canada. Now I am not saying they are doing things in an unsafe manner, but they might do things with less efficiency or perhaps not up to the standard in terms of "Canadian" quality. I understand that foreign candidates have proven their academic standing but that doesn't necessarily means that the "quality" is there. This will definitely be a hard point for a foreign candidate to prove that he is proficient in terms of "quality" of work but it is something that should be a topic that needs to be explored.
- 3) In terms of worker morale, it might increase as each workers job security increases. This will lead to higher productivity and a better sense of belonging within the company. What I am trying to state is, currently I believe we are in a over-saturated labour market in terms of engineers in Alberta. If we allow even more workers into the marketplace, the workers currently have jobs might feel threatened by someone taking over the job and mistakes might occur due to stress or other issues. If we reduce the labour market, give the workers security, they can vastly perform at a higher level and achieve greater success within the company.

I would suggest several ways to look at this problem. Perhaps we should look at the medical doctor association and follow a similar approach in dealing with the number of members that are admitted each year. To my understanding, doctors based admittance into their school/association based on a "per capita" basis. Perhaps we can look at a similar model?

I also want to stress another point that was brought up by [by another for who I have cc' on the e-mail]*. By opening P.Eng to all persons with a Canadian residency / citizenship, we are effectively allowing foreign nationals to control our association. That is similar to the situation of how the federal government has limited the amount of foreign control in certain

industries in Canada (such as oil/gas and banks). The reason being foreign nationals might have interest that are not 100% in the best interest to Canadians. In other words, it might do us more harm than good.

In my understanding of any association, the first priority is to PROTECT the interest / well being of their members. Part of that well being is job security / salaries. Please take that into consideration when moving forward in the legislative review. I would like to write an OP-Ed piece on this topic and publish in the PEGG if possible. The reason being I want to see how many members agree with this view. From the meeting on Monday, I can tell you there are quite a few of us out there that share a similar perspective on this matter. Please let me know how to proceed with this.

**name removed for anonymity*

My main concern regards governance issues although you do raise some other concerns that may be valid as well. Yesterday, I checked on how many APEGA members actually voted...--less than 22%. It was much lower than this at [my company]*. Complacency is an issue. Also, nearly a Third of APEGA's membership are not eligible to vote right now (MITs are part of that group). I have some personal opinions about this which I'll be submitting. I don't think there is anything wrong with MITs having to soak a while and get some experience before they are granted full privileges. That might be part of why some of the changes are being proposed.

I'm concerned that members are not going to realize the significance of these proposals. My role at [my company] allows me to raise awareness on these proposed changes so that's where my efforts are going to be focused.

**name removed for anonymity*

I am sending you this email as a follow-up to the recent membership consultation in Calgary. During this meeting the April 2015 Discussion Paper relating to Professional Licensees was presented.

I pointed out a number of misrepresentations from the Engineering & Geoscience Professions Act contained in the APEGA discussion paper.

I also pointed out how these misrepresentations, combined with a lack any member and public education by APEGA has caused the confusion mentioned in the paper. This confusion still exists more than 15 years after Registered Professional Technologist/ Professional Licensees gained the right to practice engineering in the Province of Alberta.

I note that the subject April 2015 Discussion Paper related to Professional Licensees remains on the APEGA website uncorrected and APEGA continues to use this misleading document in presentations. It also appears no effort has been made to point out these misrepresentations to members and the public.

During the consultation we also discussed entrance of Engineering Technology Diplomas or Associate Degrees to P.E. Licensure in the United States. You commented to me and further explained to the membership that this was somewhat of an anomaly and limited to only two U.S. states.

After doing some checking into this I disagree since your comments since they appear incorrect. My quick check of a few of the State Board of Engineers websites was able to identify nine states that allow entrance to applicants with Engineering Technology Diplomas or Associate Degrees, some required increased experience in lieu of an Engineering Degree. Without conducting a thorough review of all States I found that this applies to Montana, Washington, Oregon, California, Maine, Delaware, Massachusetts, South Carolina and North Dakota. In some cases where information appeared unclear I verified my findings through discussions with representatives of the respective State Board of Engineers.

It is important to present accurate information to the membership and public. Information which makes misrepresentations as is the case with the subject discussion papers issued by APEGA only misleads and does very little to allow meaningful discussion on Engineering Practice Legislation.

Please kindly advise when APEGA will be re-issuing the April 2015 Discussion Paper related to Professional Licensees.

After attending the seminar on April 22, 2015, I was informed there would be changes regarding the designation of P.L. (Eng) being converted to Limited Licensee (L.L.) designation.

My conclusion from what was discussed at the session, is that because a change is being made to allow foreign engineers to work in Alberta under a limited scope of practice, APEGA is planning to take this opportunity to also convert the P.L.

(Eng). designation to the L.L. designation.

I am puzzled by the move to make this change for Technologists who have met the requirements set out by APEGA for the R.P.T. and later changed to the P.L. (Eng) designation. This designation fills the needs of existing Technologists, as well as foreign or even domestic engineers that who do not qualify for P.Eng designation, but do qualify for a limited scope of practice.

This will be the third (3rd) time that the designation for individuals with a limited scope of practice, will be changed. I believe this will cause additional confusion for the public, government, and between APEGA members as well. When I received my receipt for my permit fees it still has R.P.T.

Here are some points to consider:

The P.L. (Eng) designation is already in place and will cover the additional people who require a limited scope of practice designation

I have reviewed some Alberta Government documents and it was noted that either a P.Eng or a P.L. (Eng) can be noted as the responsible individual. Yet at the seminar on April, 2015, we were told that there seems to be a “public” concern with the designation of P.L. (Eng). I am confused by that statement, I have not faced that confusion, nor does the Alberta Government indicate confusion in the documentation I reviewed.

Changing designations and the work that comes with this will be costly (i.e.: government documents, changing marketing and communications materials, websites, printed documentation; new designation stamps will be required, communicating with members, the public, business, and government, etc...), with costs going to APEGA, governments, and members.

Rather than go through the expense, time and confusion that changing the designation will mean, it makes more sense to spend half the effort doing a better job at communicating the difference between a P.Eng and a P.L. (Eng) to the public that APEGA feels is confused.

Conclusion:

I see no need for the elimination of the P.L. (Eng) designation; simply allow this designation to also be utilized by foreign / domestic engineers with a limited scope of practice that do not meet the qualifications for the Professional Engineer (P. Eng.) designation.

As a member in good standing with APEGA, I am seriously concerned at this change. It has no benefit to the public, government, APEGA, nor the 400+ P.L.(Eng)s.

1. MITs – this is just the “right thing” to do.
2. Licensee – Streamlining is good, but we must acknowledge a risk of watering down relevant local interests. How do you prevent non-resident members from perhaps pushing an agenda that is not in Alberta’s interests. Can people “game the system”?
3. P.L. – Streamlining is good, but this does not go far enough. We need to have one association for engineers and engineering technologists. Government has forced one act model, but that is cumbersome, confusing, and inefficient. Move to one professional society covering all designations from technician to engineer.
4. Student – The second category are not students. If they choose to go back to school they will become students. If not, they are applicants who have been assessed exams to prove their competence. The student category should include part-time as well as full-time.
5. Authority to delegate – “just do it”
6. Building code exemptions – avoid duplication leading to possible contradiction.

The person who doesn’t have engineering degree should not be able to guide other licensee or professional engineer. They should not be given position of supervisors/lead or higher positions.

Professional License should only be given to Canadian permanent residents/citizen not to anyone in the world. Persons should also have Canadian experience to get the professional license.

The duration of MIT should not be increased from more than 8 years for everyone, only for female members with children.

MIT should not be able run for council before completing 2 years of experience as an MIT.

There should be a technical exam for the Professional License (Law and ethics is not enough).

Issuing license to non residents of Canada will compromise public safety as they will not be liable same as an engineer in Canada.

Professional Membership should be limited to Canadian citizens and Permanent Residents only. APEGA should introduce mandatory technical exams for all persons applying to become professional members. Not all PENG's are technically competent to hold a license.

There are too many P.ENG's. Entry requirements to become P.ENG for Canadian grads are too low. Eliminate the one year Canadian experience requirement. It is discriminatory. Allowing Foreigners (non PR's) to hold a PENG might compromise national security/public safety/public accountability.

I am very concerned about the lack of sanction for folks who are not in Alberta but licensed to practice here. It seems inappropriate that someone who has never been an Albertan (sic) and cannot be easily pursued within the bounds of our legal system can be licensed to practice engineering here.

1. For foreign licensees, how can APEGA monitor their qualification and practice?
2. In general, the new act is relaxing the requirements for professionals. How does APEGA keep the high level of qualifications of professional members to protect Alberta public interests.

What is punishment for License Engineer living abroad (sic)? For MIT, those guys can't be in union?

Ask the LL License to take the academic exams. Why don't you (sic) create a general exam including all necessary knowledges required as a professional Engineer in Canada.

For giving full license (P.Eng/P.Geo) to foreign license, how do AOEGA guaranteed that in case if those member fail. APEGA will penalized them as if the member can not work as engineer or practice. If they are penalized for not working in Alberta, their damage on career is not significant as those who work and live here.

Informational, timely. Good for member to stay informed. Concerning about foreign licensee as P.Eng: requirement, scope of work, CPD and punishments etc.

Foreign licensee: the rationale of the public not being able to distinguish between a P.Eng/P.Geo and a foreign licensee seems not sufficient enough reason for this change. Perhaps a name change from "Foreign Licensee" to "Foreign P.Eng/P.Geo" would clarify sufficiently for the public.

Do not agree with non-residents/citizens being allowed to run for APEGA board positions.

To what capacity will MIT's be able to participate in the council? For instance, will it now be possible to have a President of APEGA that is still an MIT? How will the experience of the person running for council be taken into consideration? You had mentioned that the duration of MIT membership could be extended under circumstances such as women with child, etc (compassion leave). Would the same consideration/logic be applied to holding your professional designation as a P.Eng or P.Geo?