

July 3, 2020

Professional Engineers Ontario  
Professional Standards Committee  
Sent via email: [consultations@peo.on.ca](mailto:consultations@peo.on.ca)

**RE:** Guideline for Providing Engineering Services Under O. Reg. 1/17 and Part II.2 of the EPA

The Ontario Society of Professional Engineers (OSPE) is the advocacy body and voice of the engineering profession. Ontario currently has over 85,000 professional engineers, 250,000 engineering graduates, 6,600 engineering post-graduate students and 37,000 engineering undergraduate students.

OSPE would like to take this opportunity to respond to the Guideline for Providing Engineering Services Under O. Reg. 1/17 and Part II.2 of the EPA.

We believe that the Guideline does not address the main ethical and professional concern of engineers working in the permitting system in Ontario, since it does not account for cumulative air emission concentrations. We believe that the Guideline would be strengthened by making cumulative assessments for air quality levels assessed for permitting applications mandatory.

Engineers are required to sign-off on air emission impact assessment documents. This leaves them with the dilemma of ethically going beyond current guideline requirements or stick with regulatory requirements that risk public health and safety by not assessing their total airborne exposure. This is a matter of concern for the health and wellbeing of the general public. Unfortunately, the current system does not meet the standard of ethics that the public expects of engineers.

The Guideline makes no mention of the liability incurred by the engineer, and his/her client, when not assessing for adverse effects by accounting for cumulative air quality levels.

**Section 4: Responsibilities of the LEP** does not explain exactly what the requisite qualifications are – which courses, how many, etc. We believe that this Guide would be strengthened by explaining this in detail.

**Section 6.6 Professional Competency and Disclosure** should also recommend the disclosure of formal training that the person has had in air quality- courses, educational training, etc.

Sincerely,  
Réjeanne Aimey, P.Eng.



Chair and President  
Ontario Society of Professional Engineers

Sandro Perruzza



Chief Executive Officer  
Ontario Society of Professional Engineers

2020023