



From the office of the Chief Executive Officer / Du cabinet du chef de la direction

September 19, 2018

Canadian Environmental Assessment Agency
10 Barbers Hill, Suite 301
St. Johns, NL
A1C6M1

Re: Engineers Canada's Comments on the Draft Regional Assessment of Offshore Oil and Gas Exploratory Drilling East of Newfoundland and Labrador

To whom it may concern,

Thank you for the opportunity to provide comments on the draft regional assessment regarding offshore oil and gas exploratory drilling east of Newfoundland and Labrador. Engineers Canada feels strongly that a professional engineer should be included in both the proposed Technical Advisory Group and the proposed Committee.

Engineers Canada is the national organization of the 12 provincial and territorial associations that regulate the practice of engineering in Canada and license the country's 295,000 professional engineers. Engineering is a regulated profession in Canada with engineering regulators being established through Acts of the provinces and territories. Engineers are licensed professionals who hold a licence to practise engineering with one or more of Canada's 12 provincial or territorial engineering regulators. Engineers Canada exists to support the provincial and territorial engineering regulators, especially in coordinating their activities with the federal government. Together, we work to regulate engineering in the public interest.

Engineers from all engineering disciplines are integral to the exploration, testing, discovery, extraction, and distribution of offshore oil and gas. The self-regulation of the engineering profession in Canada ensures that engineers are held to high professional and ethical standards. Regulation minimizes the risks to workers and the natural environment while simultaneously ensuring that engineers practise in the public interest.

Public safety is threatened, and environmental, social, and economic impacts are not adequately addressed, when engineers in Canada are not directly involved in the design, review, implementation, and maintenance of projects that require engineering work. Engineering work, regardless of whether it is under federal or provincial jurisdiction, should require the involvement of an engineer.

The draft agreement to conduct a regional assessment of offshore oil and gas exploratory drilling east of Newfoundland and Labrador states the need for a process to be established to create a Committee pursuant to the Canadian Environmental Assessment Act 2012 (CEAA). A Technical Advisory Group who will report to the Task Team and later to the Committee during the Regional Assessment, will be responsible for gathering information, conducting analysis, and providing

advice to the Committee. Given that the public interest is best served when engineering work, specifically in relation to regional assessments of offshore oil and gas exploratory drilling, is overseen by engineers, it is imperative that all individuals providing engineering services, are licensed by one or more of the provincial and territorial engineering regulators. In addition, a professional engineer should be included on the Committee as well as in the Technical Advisory Group.

Once again, we thank you for the opportunity to provide feedback and we look forward to continued discussions on this important initiative.

Sincerely,