



British Columbia Stone Sand & Gravel Association

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January 19, 2018

Honourable George Heyman  
Minister of Environment and Climate Change Strategy  
PO Box 9047, Stn. Prov. Govt.  
Victoria, BC, V8W 9E2

Dear Minister:

Re: BC Stone Sand and Gravel Association's review of "Professional Reliance"

The British Columbia Stone, Sand and Gravel Association (BCSSGA) is committed to providing government, businesses and the public with access to B.C.'s affordable, sustainable and recyclable aggregate resources in an environmentally responsible manner. Established in 1988, the BCSSGA now represents industry members who produce the majority of the aggregate used in British Columbia. Basically aggregate stone, crushed rock and sand, and we consume 50 million tonnes of aggregates each year in British Columbia. All construction uses aggregates – homes, schools, hospitals, roads and bridges are all built using aggregate based materials

The BCSSGA relies on the professional expertise of many qualified professionals (QP's) and is pleased to offer our perspective on "Professional Reliance" as it applies to the environmental and resource extraction sectors. We appreciate this opportunity.

**The BCSSGA supports the position that government must ensure consistent and transparent professional and technical standards while also ensuring stable and reliable access to qualified QP's at reasonable costs.**

Our members use QP's to prepare and submit plans for all phases of development, mining and reclamation of aggregates sources. Any changes that restrict the number of QP's available to do the work will result in lengthy processing times for licenses and permits and will add unnecessary costs to operating an aggregate supply business and therefore increases the costs of construction in our province.

The BCSSGA is, in principal, supportive of the province's efforts to bolster public confidence in the information provided by QPs upon which decisions are made and we would support the following:

1. The BC government should provide a greater level of engagement and more oversight of the professional associations to ensure standards acceptable to the government, industry and the public are being met.

***Aggregates Build B.C.***

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2. The BC government should work with the professional associations to develop consistent standards across the province.
  3. The BC government should make it a requirement that all complaint handling be made consistent across all professions and much more transparent to the public.
  4. The BC government should receive annual reports from the professional associations listing the complaints and describing what action they will be taking to prevent a reoccurrence.
  5. One size does not fit all. The BC government should align the credential required with the risk. For example, should ASTTBC credentialed professionals be permitted to carry out work concerning the "Water Sustainability Act", currently this is restricted to Professional Engineers?

We believe that the existing regulations around QPs are currently serving us well. We also believe there is room for improvement if government works collaboratively with the professional associations that our members rely on. To ensure an adequate supply of QP's to do the work, we request the government move forward taking a cautious and strategic approach to implementing change.

We appreciate the opportunity to provide our comments on this important issue.

Sincerely,

A handwritten signature in black ink, appearing to read 'Derek Holmes'.

Derek Holmes, President  
British Columbia Stone, Sand and Gravel Association

Cc. The Honourable Michelle Mungall – Minister of Energy, Mines and Petroleum Resources

Cc. Mark Zacharias, Deputy Minister, Ministry of Environment and Climate Change Strategy

Cc. Dave Nikolejsin, Deputy Minister, Ministry of Energy, Mines and Petroleum Resources

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