



**Association of the
Chemical Profession
of Alberta**

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22nd February 2008

Mr. Tim Krsul
Senior Policy Analyst
Ministry of the Environment
Integrated Environmental Planning Division
Land and Water Policy Branch
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Re: Brownfields Regulation – Qualified Persons, EBR Registry Number: 010-2364

Dear Mr. Krsul,

The Association of the Chemical Profession of Alberta wishes to make the following comments regarding the proposed changes in the definition of Qualified Persons in Ontario.

Our primary concern is that the proposed changes will prevent certain qualified professionals from performing work in this area and that this does not protect the public interest. Site assessments are frequently multidisciplinary and it is important that professionals with the appropriate training and experience take responsibility for the work to ensure that standards are met. In particular much of this work is chemical in nature and it is important that trained chemists are involved. Removing Chartered Chemists from the list of Qualified Persons could result in work being done by those who do not have sufficient expertise in chemistry.

We are also concerned that this proposed change may prevent certain chemists in Ontario from earning a living and that this in turn will impact the chemical profession in Ontario. Chemistry and the chemical profession play an important role in the economy.

In Alberta the six regulated professional associations involved in reclamation and remediation work have developed a Joint Practice Standard as part of Alberta Environment's procedure for reclamation certification, included in documents that require professional sign-off are laboratory reports as they are the bases for most legal issues related to environmental work.. This ensures that all environmental related work is

completed to the same high standard in order to protect public safety. It is our hope that other Canadian jurisdictions will follow similar collaborative approaches. Details are available on our web site:

<http://www.pchem.ca/ACPA/Committees/EnvironmentalSignOff.html>

In conclusion, we consider that the proposed changes will adversely affect the quality of environmental work in Ontario and affect public safety. In addition, there is a possibility a regressive proposal such as this might have long term negative impacts on the chemical profession in industry and education in the province of Ontario.

I thank you for the opportunity to comment on this proposal and would be happy to provide additional information if it is required.

Sincerely Yours,

Roger Cowles P.Chem
President ACPA