



Association of the Chemical Profession of Ontario
Association des chimistes professionnels de l'Ontario

January 15, 2008

Mr. Tim Krsul

Senior Policy Analyst

Ontario Ministry of the Environment

6th Floor

135 St. Clair Avenue W.

Toronto, Ontario

M4V 1P5

Dear Mr. Krsul:

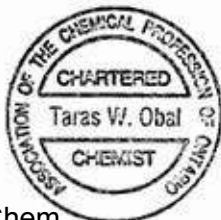
ACPO would like to thank you for providing us with the opportunity to discuss the issue of Environmental Site Assessment and the work that the Ministry of the Environment Standards Development Branch is undertaking in order to develop its new regulations, specifically with regards to the designation of Qualified Persons in its relationship to Records of Site Condition (RSCs), and how this may impact on the ACPO and its members.

We believe that many of our members (Chartered Chemists) are fully qualified, experienced and responsible to undertake work in the field of environmental site assessment and other environmental areas.

We have provided you with a document that presents rationale for our stated position, and that addresses the issues that were raised at our meeting on January 8, 2008. If you have any comments and/or questions, or require further information, please contact us.

We are convinced that our case provides sufficient basis for the MOE to include Chartered Chemists in the current and any future definition of Qualified Person.

Yours truly,



Terry Obal, Ph.D., C.Chem.
Co-Chair, Professional Affairs Committee
Chair, Environment Committee
ACPO

Robert Johnson, C.Chem.
Co-Chair, Professional Affairs Committee



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ACPO PRESENTATION
TO THE
ONTARIO MINISTRY OF THE ENVIRONMENT
REGARDING
ENVIRONMENTAL SITE ASSESSMENT AND QUALIFIED PERSON DESIGNATION

January 15, 2008

Prepared by:

Terry Obal, C.Chem.
Robert Johnson, C.Chem.
David Naranjit, C. Chem.



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ACPO Presentation to Ontario Ministry of the Environment Regarding Environmental Site Assessment and Qualified Person (QP) Designation

The *Association of the Chemical Profession of Ontario* (ACPO) is requesting continued recognition of Chartered Chemists by the Ontario Ministry of the Environment (MOE) Standards Development Branch (SDB) as Qualified Persons (QPs) under any new legislation to be proposed by MOE. The current regulation, Ontario Regulation 153/04, recognizes Chartered Chemists practicing in the environmental field as Qualified Persons (QPs) with the ability to perform and take responsibility for Phase I and Phase II Environmental Site Assessments. This section of the regulation was scheduled to be “sunsetting” in October of 2006. However, since a suitable replacement mechanism was not in place at the time, the MOE extended the existing definition of QP for a period of 18 months, i.e., until March 31st, 2008.

The ACPO has submitted to MOE that it has fought long and hard to have its members recognized as Qualified Persons in all matters relating to chemistry and the practice of chemistry in the environmental field in Ontario. Our many discussions and correspondence with representatives of the Provincial Government have resulted in the inclusion of Chartered Chemists under the current *Ontario Regulation 153/04*, pursuant to Part XV.1 of the *Environmental Protection Act*, as Qualified Persons who may conduct Phase I/Phase II environmental site assessments. This recognition by the Provincial Government, has already affirmed that Chartered Chemists who have the appropriate environmental expertise and experience, through their integrity, competence and adherence to a strict Code of Ethics, are qualified to conduct environmental consulting work.

There are currently hundreds of chemists and other scientists carrying out environmental work, ranging from risk assessment of sites to Phase I and Phase II environmental audits.

In Phase I Environmental Site Assessments (ESAs), standard protocols established by the Canadian Standards Council and included in Regulation 153/04 require that components of evaluation include many items such as asbestos, lead paint, tanks, chemical inventories, waste handling, PCBs, urea formaldehyde foam insulation (UFFI), and spills handling among others. Chartered Chemists are exceptionally well qualified, probably more than many, to carry out such evaluations.

Aspects of Phase II ESAs involve evaluation of site locations with regard to air, soil and groundwater contamination. This contamination stems from a wide range of chemicals from diverse sources – both current and historic. All of these issues are chemical in nature, and chemists are ideally suited and qualified to evaluate the potential interactions, movements and locations of risk to the public and the environment.



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Appropriate and well planned field sampling activities require a sound knowledge of the chemistry surrounding these various contaminants in order to ensure the quality, integrity and “representativeness” of the data to be used in the site assessment. Ultimately, the sampling, chemical analysis and data interpretation have a chemistry component and all require the input of a chemistry professional. These elements comprise the largest component of any ESA.

The samples themselves pose an enormous challenge to the QP, as they represent complex chemical matrixes. How does one ensure the best evaluation of these components without involvement of chemists in both the field and laboratory?

A strong chemistry background, training and experience are required in interpreting results as this will greatly affect a risk decision. Records of Site conditions are the documented evaluation against standards established by the Ministry of Environment. These risk-based standards require input from chemists at all levels to ensure reliability and accountability in the planning, field collection, lab testing, standards development, risk evaluation, and reporting components of the environmental site assessment process.

By excluding Chartered Chemists from the definition of Qualified Person, the impact on our membership working in the environmental field will, of course, be devastating. Many of our members (particularly those in private practice) will be prevented from earning their livelihoods through work in the environmental field, by restricting their ability to pursue and bid on such work, for which the Provincial Government has already recognized that they are qualified. This sets a damaging precedent for the Association and for Ontario, potentially impacting ACPO members' inclusion as Qualified Persons in future environmental legislation which is based on chemistry and chemical testing. Finally, this will constitute a significant step backwards in the ACPO's mandate to represent, promote and advance the practice of chemistry, and to address the issue of the safety and welfare of the general public in environmental matters in Ontario.

We are confident that the MOE will give careful consideration to the environmental chemical expertise, competency, integrity and standards of professional practice of many of our Chartered Chemists, and hence, the equivalency with other licensed professions in carrying out environmental site assessments. We are confident that Chartered Chemists will continue to be recognized as Qualified Persons under any new regulations in Ontario.

This rest of this presentation addresses issues raised at the January 8, 2008 meeting with Mr. Tim Krsul of the MOE, and will provide additional reasons for the continued recognition of the ACPO as a legitimately regulated and qualified resource to industry, consultants and government in all matters relating to chemistry in the environmental field. This section will focus on the following key points:



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- ACPO: History and Mandate;
- Objectives of the Association;
- Membership Eligibility Requirements - membership eligibility requirements for Chartered Chemist status within the Association as well as registration as an Environmental Practitioner (ACPO Environmental Registry);
- Disciplinary Process - disciplinary process including enforcement and investigation of malpractice and professional incompetence;
- Ethics and Standards of Practice - including the Code of Ethics binding all Chartered Chemists to a strict code of conduct, professional practice standards and highest standards of integrity;
- Liaison with MOE and Other Professional Organizations - communication between the MOE and ACPO in matters relating to Records of Site Condition (RSC) and Chartered Chemists, and ACPO's commitment to work with the MOE and any other organization to develop and promote rigorous standards of integrity, ethics and excellence in protecting the environment and public well-being; and
- Conclusion

ACPO: History and Mandate

The *Association of the Chemical Profession of Ontario* (ACPO) has been the recognized provincial association representing professional chemists in Ontario for forty-five (45) years. The ACPO is currently governed by an Act of the Legislature of Ontario which was enacted in 1984 (*"An Act Respecting the Association of the Chemical Profession of Ontario"*, Chapter Pr10, *Statutes of Ontario, 1984*), and which replaced the previous Act of Incorporation of 1963 (*Act of the Legislature of Ontario, Statutes of Ontario, 1962-63, chapter 157*). The current Act recognizes the practice of Chemistry in Ontario, identifies the ACPO as being responsible for regulating the practice of chemistry in Ontario, and affords each qualified member the right to use the designation "*Chartered Chemist*".

Until recently, no other province or territory regulated the practice of chemistry in Canada except for Ontario and Québec. Now, both Alberta and British Columbia, recognizing the importance and value of high standards of integrity and ethical practice, have also passed legislation recognizing chemists as professionals, and whose practices are regulated under their respective associations. The ACPO works in close cooperation with the professional chemical associations of other provinces including: the Ordre des chimistes du Québec (OCQ), the Association of the Chemical Profession of Nova Scotia (ACPNS), the Association of the Chemical Profession of Alberta (ACPA), and the Association of the Chemical Profession of British Columbia (ACPBC).

The ACPO represents close to one thousand practicing Chartered Chemists in Ontario. ACPO members are employed in the academic and consulting sectors, in a variety of



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industries and at various levels of government. Typically, ACPO members work in the environmental, food, pharmaceutical, consumer goods and geological fields, among others.

ACPO members are governed by a Code of Ethics ensuring a strict code of conduct and the highest standard of integrity. Additionally, the ACPO has in place a disciplinary committee to regulate the actions of its members and hold hearings into allegations of professional misconduct or incompetence.

Objectives of the Association

The Objects of the Association are mandated by Provincial regulation (Association of the Chemical Profession of Ontario Act, 1984, Article 3) and are presented below.

ACPO Act (1984), Article 3
Objects

The objects of the Association are:

- (a) to furnish means and facilities by which members of the Association and undergraduates may increase their knowledge, skill and efficiency in all things related to the business or profession of professional chemistry;*
- (b) to hold such examinations and prescribe such tests of competency as Council considers appropriate to qualify for admission to membership in the Association;*
- (c) to maintain discipline among members of the Association and undergraduates; and*
- (d) to do any other thing that the Council reasonably considers will further its objects.*

The ACPO has expanded on these objects in its By-Laws to emphasize its responsibilities for the safety and welfare of the general public and for ensuring that its members maintain high standards of practice (By-Laws, Revision 1.1, Article IV) and are presented below.

By-Laws (Rev. 1.1), Article IV
Objects

The objects of the Association shall be:

- 1. to make the profession of increasing service to industry and the public;*
- 2. to maintain high standards of competence, integrity and ethics within the profession;*
- 3. to develop further an appreciation of the profession among other ones, industries and the public;*
- 4. to improve the conditions under which members of the profession are working within the province;*
- 5. to promote among students a recognition of the importance of the study of chemistry and chemical engineering;*
- 6. to promote and increase the knowledge, skill, and proficiency of its members in all things relating to chemistry and chemical engineering;*



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7. *to improve the standards of excellence in research, investigation, education, and publicity as they pertain to the profession;*
8. *to do any other thing that the Council reasonably considers will further its objects.*

Membership Eligibility Requirements

Membership in the Association

The ACPO has the right in law to pass By-Laws prescribing the qualifications for and conditions of registration for members, prescribing educational and other qualifications that must be met by candidates for admission as members of the Association, and establishing a Board of Examiners and governing the actions of the Board (Association of the Chemical Profession of Ontario Act, 1984, Article 6.1 (a), (b), and (e)).

Details of the eligibility requirements for membership in the Association (By-Laws, Article VI, Revision 1.1) and the right to use the title Chartered Chemist are presented below.

By-Laws (Ver. 1.1), Article VI ***Registration***

1. *Individuals who possess the following academic qualifications, or training and experience may be admitted as members:*
 - a. *An Honors Degree in Chemistry or its equivalent in Chemical Engineering or the Chemical Sciences from an institution accredited by the Association. In addition, two (2) years of work experience under conditions acceptable to the Association are required. Post Graduate training will be credited as equivalent to work experience; or*
 - b. *Lower academic qualifications such as a three-year Bachelor's degree with a Chemistry Major with extensive experience [minimum five (5) years] and a record of professional competence in the chemical field as evidenced by publications, patents, etc.;*
 - c. *Individuals who have at least six (6) years of suitable experience in the chemical field but who do not possess the above academic qualifications may qualify for membership by passing examinations set by the Association. Such examinations will be set at the Honors degree level;*
 - d. *In the case of a ruling by the Board of Examiners that the documentation supplied by an applicant does not meet the requirements for membership as specified in sub-paragraphs (a) to (c), and upon the recommendation of the Chair of the Board of Examiners, the applicant may be invited to an oral interview. This will be conducted by a committee convened by the Chair, and shall consist of at least three (3) Councillors plus other appropriate chemists as required by the Chair. The applicant shall be supplied with the areas which may be covered in the interview at least two (2) weeks before the interview. Discussion and written comments, if any, will guide the committee in its recommendation to the Council to determine the final disposition of such application.*



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3. *The Council may waive any requirement of residence in Ontario.*
4. *No corporation, partnership, or association of persons shall be registered with the Association.*
4. *The registration of an applicant, unless the application be refused, shall be construed to be an undertaking to conform to all the by-laws, rules, regulations and requirements of the Association, which may from time to time be adopted.*
5. *A member in good standing who ceases to be a member of the Association may upon payment of the appropriate fee, and subject to the qualifications set for registration by the Association, be re-registered without examination.*
6. *The Council may, by unanimous vote, elect as an honorary life member, any individual who has reached the age of sixty-five (65) years and who has retired or any member who has rendered signal service to the Association or to the profession.*
7. *The name of any member in default of fees or for other justifiable causes may be removed from the register on the order of the Council after one month's notice sent by mail to the member's last registered address.*

Membership in the Environmental Registry

The ACPO takes its responsibility regarding the qualifications and experience of its members and possible consequences for the safety and welfare of the public very seriously. Thus, recognizing that the above standard requirements may not be sufficient in certain areas of practice, the ACPO introduced sub-sections of membership in the areas of Occupational Health and Safety and Environment. In order to be listed in the Registries for these sub-disciplines, members have to meet additional requirements in the areas of formal education, continuing education and/or years of experience working in the area. There are over one hundred members listed in our Environmental Registry.

We are not aware of any other professional organization in Ontario that has a defined Environmental Registry, with additional stringent eligibility requirements over and above those required for membership in the Association.

ACPO is prepared to work with the MOE and any other association to revise and harmonize the criteria for eligibility in the Environmental Registry to ensure alignment with MOE's definition and requirements of Qualified Persons.

Disciplinary Process

The ACPO has several ways in which it may prescribe conduct, and discipline members who do not adhere to its standards of practice and Code of Ethics.



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The ACPO Act of 1984 allows the Association to pass By-Laws regulating and governing the conduct of members of the Association in the practice of their business or profession, by prescribing a code of ethics, rules of professional conduct and standards of practice, and by providing for suspension, expulsion or other penalty for professional misconduct, incapacity or incompetence (Association of the Chemical Profession of Ontario Act, 1984, Article 6.1 (c)).

The Act also provides for misuse of the C.Chem designation stating that “Every person in Ontario who, not being a registered member of the Association, takes or uses the designation "Chartered Chemist" or "C. Chem." alone or in combination with any other word, title, name, initial or description, other than initials or words that indicate that the title used was granted in a jurisdiction outside of Ontario, or implies, suggests or holds out that he is a chartered chemist, is guilty of an offence.” (Association of the Chemical Profession of Ontario Act, 1984, Article 8.2).

It also provides for appeals through Ontario Courts regarding any decision made by the ACPO regarding membership, suspension, and/or any other any other sanction that the Association may impose on a member (Association of the Chemical Profession of Ontario Act, 1984, Articles 7 (4 - 6)).

The disciplinary process is carried out through the Discipline Committee. The committee is comprised of five (5) members two (2) of whom are not members of the ACPO but are members of a recognized technical group (By-Laws, Article VI.8, Revision 1.1).

By-Laws (Ver. 1.1), Article VI.8

Discipline Committee

- a. *The Council may constitute a Discipline Committee to consider the removal of any member from the Register for any reason other than default in payment of fees;*
- b. *The Discipline Committee shall be composed of three (3) members of the Council, together with two (2) persons who are not members of the Association, but who are members of a recognized technical group;*
- c. *Council shall name one member of the Discipline Committee to be its Chair;*
- d. *A majority of members of the Discipline Committee shall constitute a quorum, provided that not less than two (2) members of the quorum shall be members of Council, not less than one member of the quorum shall be a person who is not a member of the Association, and all disciplinary decisions shall require the vote of a majority of the members of the Discipline Committee presiding at the hearing, but in the event of a tie vote, the Chair shall have a second or casting vote;*
- e. *Council may direct the Discipline Committee to hold a hearing and determine any special allegation of professional misconduct or incompetence, or any other matter which, in the opinion of Council, requires disciplinary proceedings, in respect of a member of the Association;*



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- f. *In the case of hearings into allegations of professional misconduct or incompetence or any other matter, the Discipline Committee shall:*
- I. consider the allegations, hear the evidence and ascertain the facts of the case;*
 - ii. determine whether upon the evidence and facts so ascertained, the allegations have been proven;*
 - iii. determine whether in respect of the allegations so proven, the member is guilty of professional misconduct or incompetence, or is otherwise subject to discipline by the Association;*
 - iv. determine whether the name of the member is to be removed from the Register in cases where a member has been found guilty of professional misconduct or incompetence or is otherwise subject to discipline;*
 - v. recommends for suspension the membership of the member for a stated period of time;*
 - vi. impose such restrictions on the membership of the member for such a period of time and subject to such conditions as the Discipline Committee designates;*
 - vii. reprimand the member and if deemed to be warranted, direct that the fact of such reprimand be recorded in the Register;*
 - viii. if the name of the member has been removed from the Register, to advise whether such member may resubmit an application for membership after such period of time as the Discipline Committee may decide;*
 - ix. make provision for recording a transcript of the proceedings of any hearing held by the Discipline Committee;*
- g. *Where the Discipline Committee recommends that the name of a member be removed from the Register, Council shall require the Registrar to remove the name of the member from the register and to take steps to recover from the member the Certificate as to the member's status as Chartered Chemist;*
- h. *The member whose conduct is to be subject of a hearing of the Discipline Committee shall be advised of the allegations made against him or her, and shall be permitted to attend the hearing and to be represented by counsel at such hearing, to question any witnesses who make submissions at the hearing, and to submit evidence and make arguments on his or her own behalf;*
- I. *Where the Discipline Committee is of the opinion the holding of a hearing was unwarranted, the Committee may order that the Association reimburse the member for his or her costs or such portion thereof as the Discipline Committee deems appropriate;*
- j. *Where the Discipline Committee recommends the removal of the name of a member from the Register, such removal shall be deemed to take place immediately following the decision of the Discipline Committee, notwithstanding that any appeal proceedings may be taken by the member;*
- k. *Documents and things put in evidence at a hearing of the Discipline Committee shall, upon request of the person who produced them, be released to him or her by the Committee within a reasonable time after and issue has been finally determined.*



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Ethics and Standards of Practice

The ACPO has the right in law to pass By-Laws regulating and governing the conduct of members of the Association in the practice of their business or profession, by prescribing a code of ethics (presented below), rules of professional conduct and standards of practice and by providing for suspension, expulsion or other penalty for professional misconduct, incapacity or incompetence (Association of the Chemical Profession of Ontario Act, 1984, Article 6.1 (c)).

Code of Ethics

The purpose of this code is to provide guidelines to ensure that Chartered Chemists in Ontario adhere to high ethical standards of practice.

It is intended that the principles expressed in the code clarify what the Association regards as appropriate standards of practice. The Chemist's Code of Conduct of the American Chemical Society (ACS) adopted in 1994 includes many responsibilities similar to those of our own Code of Ethics.

Therefore, regarding the:

a. Duty of a Chartered Chemist to the Public

A Chartered Chemist shall:

- a. place the public welfare above any consideration of self-interest and resolve any conflicts in favour of the public good;*
- b. ensure that environmental and ecological concerns are taken into account in the performance of his or her duties;*
- c. protect the public welfare through cooperation with government, enforcement and consumer agencies;*
- d. report to the appropriate regulatory agency, without fear or favour, any deliberate breach of standards that may endanger the safety and welfare of the public.*

2. Duty of a Chartered Chemist to an Employer

A Chartered Chemist shall:

- a. apprise himself or herself of the law as it relates to his or her practice and endeavour to see that both the letter and spirit of the law are obeyed, in the performance of his or her duties;*
- b. advise his or her employer of possible contraventions of ethical standards of practice and the law;*
- c. undertake to do only work that he or she is competent to carry out;*
- d. protect trade secrets or information acquired by virtue of his or her professional capacity;*



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e. be honest, diligent and conscientious in the performance of his or her duties.

3. Duty of a Chartered Chemist to a Client when in Private Practice

A Chartered Chemist shall:

- a. maintain confidentiality of matters disclosed by the client;*
- b. protect the client's property, be it physical or knowledge per se;*
- c. set fees, which reflect fairly the knowledge, skill and time involved in performing the professional service.*

4. Duty of a Chartered Chemist to other Chartered Chemists, Subordinates and other Professionals

A Chartered Chemist shall:

- a. delegate responsibility in chemical matters which require professional judgment only to another qualified chemist;*
- b. respect colleagues, subordinates and other professionals and not undertake to maliciously or otherwise undermine another's reputation;*
- c. properly supervise non-professional subordinates and other non-chemist professionals to ensure that they are not exposed to undue risk in the performance of work in a chemical environment;*
- d. willingly impart his or her knowledge to subordinates and others where appropriate, in order to enhance the overall standard of practice in his or her professional environment.*

5. Duty of a Chartered Chemist to Himself or Herself

A Chartered Chemist shall:

- a. maintain a high level of competence by continuing education throughout his or her practice; present a good image to the public by maintaining high ethical standards of practice.*

Liaison with MOE and Other Professional Organizations.

The ACPO is committed to working with the MOE, other professional organizations and governments across Canada in the areas of the environment, the promotion of chemistry and the profession of chemistry, and the safety and welfare of the general public. We have maintained ongoing contact with such organizations continuously and to date.



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ACPO/MOE Liaison

The ACPO has established several vehicles for maintaining communication with MOE. These include: direct contact with the president, Dr. David Naranjit, C.Chem., through ACPO's head office (1 Yonge Street, Suite 1801, Toronto, Ontario, Tel: (416) 364-4609), as well as direct contact with the chairs of specific ACPO committees, most notably the Environment Committee (Chair: Dr. Terry Obal C.Chem, (905) 817-5721) and the Professional Affairs Committee (Co-Chairs: Mr. Robert Johnson C.Chem., (519) 767-9854; Dr. Terry Obal C.Chem, (905) 817-5721), whose mandates include constant liaison with all levels of government.

In matters requiring disciplinary action or investigation of occurrences involving a record of site condition (RSC) and a Chartered Chemist, a complaint or concern may be filed by MOE through any one of these vehicles, but also directly through the chair of ACPO's Discipline Committee (Dr. Edgardo Alvarez, C.Chem. (613) 991-9613).

ACPO has demonstrated a strong liaison with MOE through our active involvement and participation in all stakeholder meetings and workshops relating to the issue of Qualified Persons and the requisite core competencies required of a QP. In addition, our members have demonstrated the value of qualified chemists and our desire to work with the government through our involvement with the MOE's Technical Advisory Group (TAG) in reviewing and rectifying discrepancies among the proposed standards submitted as part of the revised Regulation 153/04.

ACPO/NACPCC Liaison

The ACPO is represented on the National Advisory Committee on the Profession of Chemistry in Canada (NACPCC) by Dr. Terry Obal and Dr. David Naranjit. NACPCC is working in several areas such as: standardization of membership requirements for professional chemistry organizations, portability of membership across provinces, upgrading courses for chemists, the inclusion of professionally related courses in university chemistry programs, and the standardization of government regulations (including environmental regulations) across Canada.

We believe that such collaboration may reduce discrepancies across Canada and will lead to acceptable norms in the areas identified.



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Conclusion

The ACPO looks forward to further collaboration with MOE regarding the issue of Qualified Persons. We believe that it is in the interest of all parties (primarily the general public) to work closely together to address the issues of competency and accountability in the environmental field, particularly with regard to environmental site assessment.

We are unaware of any changes to the requirements for environmental site assessment work. As Chartered Chemists are already recognized as competent and accountable professionals who can carry out such work to the satisfaction of the MOE, and with accountability to the public, we do not see the need to change the current definition of Qualified Person as it pertains to Chartered Chemists.

If the requirements have changed, ACPO requests to be included in any discussions with MOE, and others, of such changes. We are willing at any time to work toward a solution that continues to recognize Chartered Chemists as Qualified Persons in the context of Ontario Regulation 153/04.

One such solution, based on the arguments presented herein, includes licensure of chemists by the Province of Ontario. Current governance of the ACPO includes all requisite elements of a licensed self-regulated professional body.

Thank you.

David Naranjit, Ph.D., C.Chem.
President

Taras W. Obal, Ph.D., C.Chem.
Co-Chair,
Professional Affairs Committee
Chair, Environment Committee



Robert Johnson, C.Chem.
Co-Chair,
Professional Affairs Committee