



Bioforj Environmental

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Mr. Tim Krsul
Senior Policy Analyst
Ontario Ministry of the Environment
Integrated Environmental Planning Division
Land and Water Policy Branch
135 St. Clair Avenue West, 6th Floor
Toronto, Ontario
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Delivered via fax 416 326 0461

**RE: Comments Related to the Proposal: Brownfields Regulation-Qualified Persons,
EBR Registry Number: 010-2364**

Dear Mr. Krsul;

As a professional working in the environmental industry, both myself and my business will be directly affected by the proposed changes. Bioforj Environmental has been involved since 1987 in the remediation and assessment process in Ontario. I have been involved with prior to the initiative of Qualified Person definitions and can attest to the difficulty the engineering community made working in the industry. Much progress has been made moving forward and many highly qualified people are involved in this industry. Many of these people, many of whom I have employed, are not geoscientists nor engineers.

The changing of this regulation as proposed will have great negative effects on my ability to obtain contracts and will based on limited approval from PEO or APGO provide for a distinct disadvantage for me and my business as I understand the process as it stands. Cost and practicality of this approach does not provide for any greater protection of the public good and will limit technology implementation and inhibit Brownfield redevelopment.

As a scientist, trained in microbiology and subsequently certified as a professional in the practise of Chemistry, I cannot understand why Professionals (of all disciplines) who rely very heavily on chemical analysis and principals are not included as QP's. Collection of and analysis of environmental samples are highly dependant on the chemical profession. It would be in the best interest of the public to raise the bar by the inclusion of these other professions particularly chemists so that whom ever is the QP can be accountable, competent, and rely on the complete process.

By changing this regulation, as proposed, no one other than PGeo. or P.Eng will be able to work effectively in the industry. With well know shortages of human resources, particularly senior staff, it will exuberate the development industry and not add value to the protection of the public. It is difficult enough now to move an environmental assessment process forward with out adding this limitation to an already difficult situation.

Bioforj Environmental have over the course in business conducted many Environmental Site Assessments and remediation projects to completion. To date, I have not personally had to file a record of site condition however projects that I have been involved with have had RSC done by others. I do have a site at this time that in the not to distant future will require a RSC be filed, and I will have a significant problem with the timelines and requirement to transfer responsibility proposed should this regulation be changed. I fail to understand the process and logic of the MOE and the Ontario Government when other mechanisms to improve the process not limit and inhibit the environmental protection and Brownfield redevelopment.

Regards,



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