



December 6, 2014

Mount Polley Independent Expert Engineering Review Panel  
5B – 940 Blanshard Street  
Victoria, BC  
V8W 3E6

ASTTBC, a provincially legislated self-governing professional association of 10,000+ technologists, technicians and technical specialists in applied science and engineering technology, welcomes this opportunity to provide comments for consideration by the Panel.

ASTTBC offers to the Panel 4 key points for consideration:

- *A team of qualified practitioners is involved with the design, construction, commissioning, operation, testing and maintenance of mines. Full utilization of the members of the team will aid effective delivery of services and enable all skills*
- *Practitioners providing services should be appropriately qualified, registered and accountable*
- *Standards governing the design, construction and inspection of dams should be formalized within the regulatory framework and used as reference by practitioners*
- *Regulations to frame the regulatory environment including the technical standards to be employed, roles and responsibilities of the various practitioners, and accountabilities*

It is anticipated that this submission addresses a number of elements in the Terms of Reference for the Panel. We will comment on each of these four points, but before doing so offer the following about ASTTBC to provide context for the input with this submission.

ASTTBC was formed in 1958 and re-incorporated under the *Applied Science Technologists and Technicians Act* in 1985. Members of ASTTBC have been recognized as Qualified Professionals (QP) in areas related to the matters being considered by the Panel, for example, the Environment Act defines a QP as “an applied scientist or technologist”, and to qualify as a Reclamation Specialist with the Oil and Gas Commission one must be registered with one of a number of associations including ASTTBC. Similar forms of QP recognition is being considered by the BC Government, with one over-arching principle being recognition appropriate to one’s competencies.

#### **Team of Practitioners Provide Services**

Various types of practitioners with different training and competencies provide services, usually assigned based on the task at hand and qualifications. Engineering technologists and technicians work with the teams involved with many aspects of the dam, from design through to testing and maintenance. In some instances they offer services as an independent professional.

ASTTBC-registered technologists and technicians serve in technical, managerial and leadership positions within regulatory authorities such as the BC Government, engineering consulting companies, construction firms and compliance monitoring enterprises.

Utilizing skills and fully enabling practitioners within their competencies will assure the effective delivery of services and best serve the public interest.

### **Applicable Practitioners : Qualified, Registered. Accountable**

Credentials should conform with the services being provided. Registration and accountability of the practitioners provides further quality control on the services being provided. Registration with ASTTBC, for example, assures the public that the practitioner has met stringent national standards for professional certification and registration and accountability measures expected of professional associations. ASTTBC has a proven track record of serving the public interest by regulating standards of training and practice of its members.

### **Standards & Practice Guides**

Technical standards and practice guides provide a common framework for practitioners as they provide a myriad of services from design to operations. Organizations such as APEGBC, the Canadian Dam Association and Mining Association of Canada have prepared standards and guides that are helpful for practitioners, regulators and corporations managing mining operations. ASTTBC is examining a number of these standards with a view to advising ASTTBC members on their use in providing services.

Where standards and practice guides do not exist, consideration should be given to the development of these tools as a resource for practitioners and other interested stakeholders.

### **Regulations Governing Mining Operations and Dams**

Various regulatory bodies are involved in mining operations and dams in general. The regulatory framework, in addition to framing approvals and operations requirements, is instrumental in directing practitioners and others to appropriate technical standards, and Qualified Professionals / Persons able or required for defined services. ASTTBC members have been recognized as having the competencies to carry out a variety of functions in a number of areas where a Qualified Professional / Person is required. ASTTBC encourages the full utilization and recognition of appropriately qualified, registered and accountable professionals / practitioners.

ASTTBC invites the Panel to call on the Association as needed to further explore the contribution in this submission and in the further development of the people, regulations, standards and practices associated with mining operations and dams.

Thanks for your consideration.



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