



ENGINEERS &
GEOSCIENTISTS
BRITISH COLUMBIA

REGULATION OF FIRMS BULLETIN: “NON-REGISTRANT FIRMS OFFERING ENGINEERING OR GEOSCIENCE SERVICES”

DATE OF BULLETIN	July 13, 2023
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BULLETIN

Section 52(3) of the *Professional Governance Act, S.B.C. 2018, c. 47* (“PGA”), prohibits a person (including a company) who is not a Registrant from using a reserved title or other names, titles, or language that expresses or implies that they are a Registrant authorized to practice, or associated with Engineers and Geoscientists BC.

Non-Registrant Companies often subcontract engineering or geoscience services to external professionals. In these circumstances, the non-Registrant should make clear that the services are being provided by qualified external professionals operating under a Permit to Practice.

The goal is to clearly communicate that the professional work is done by a Registrant Firm and Individual Registrant(s) who can legally engage in the practice of engineering or geoscience.

Examples:

Example 1

123 Custom Kitchens Ltd. provides kitchen renovation services, does not have any Professional Engineers on staff but has an agreement in place with an engineering firm to conduct any structural assessments or engineering design when required.

Unacceptable:

123 Custom Kitchens Ltd. is your one stop service provider for upgrading your kitchen. Our design team includes interior designers to give you the look you want. No job is too big—our designers and engineers can move walls to give you that open concept you are looking for.

Acceptable

123 Custom Kitchens Ltd. is your one stop service provider for upgrading your kitchen. Our design team includes interior designers to give you the look you want. No job is too big – we work with licensed engineering firms and we will coordinate all aspects required. Our

interior designers and engineering partners can move walls to give you that open concept you are looking for.

Example 2

Smooth Manufacturing Ltd. sells and manufactures equipment, including engineering design, to accompany its products. It does not have any Professional Engineers on staff and outsources the design work to a third-party mechanical engineering firm. The mechanical engineering firm has a Permit to Practice.

Unacceptable:

1. Smooth Manufacturing Ltd. offers manufacturing and mechanical engineering services. Our professional engineers will work with you to find the right engineering solutions for your project.

Acceptable:

1. Smooth Manufacturing Ltd. offers manufacturing services. For projects that require engineering, Smooth has worked closely with MechEng Inc. for 20 years. Smooth will work with you and Mech Eng's engineers to find the right solutions for your project.

Example 3

ABC Drilling Inc. has a P.Geo. on staff and advertises environmental, geotechnical, construction and mining services and does not have a Permit to Practice.

Unacceptable:

1. ABC Drilling Inc. provides high-quality environmental, geotechnical, construction and mineral exploration drilling services to our clients. We are a full-service company happy to plan, drill, and interpret and analyze the results for our customers.

Acceptable:

2. ABC Drilling Inc. provides high-quality environmental, geotechnical, construction and mineral exploration drilling services to our clients. We work closely with the professional engineers and geoscientists at our client companies to implement their drilling plans.

Companies can contract third parties to practice engineering or geoscience, but should make clear that the company itself is not practising engineering or geoscience. The core requirements are that if a company does not have a Permit to Practice it cannot:

1. practice professional engineering or geoscience; or
2. express or imply that it is authorized to practice engineering or geoscience.

Engineers and Geoscientists BC's Unauthorized Practice and Misuse of Title Department may become involved if there are concerns that a company is doing engineering or geoscience work without a Permit to Practice. The best practice is for the company's website to clearly state that it contracts its engineering or geoscience work to a Permit to Practice holder.

ABOUT REGULATION OF FIRMS BULLETINS

These bulletins are intended to address emergent or novel topics in a timely manner. Each bulletin provides Engineers and Geoscientists BC's interpretation of how Professional Registrants and Registrant Firms should approach the topic. The contents of the bulletins will be incorporated into broader regulation of firms guidance documents as those documents are revised.