



ENGINEERS &
GEOSCIENTISTS
BRITISH COLUMBIA

IN THE MATTER OF THE *PROFESSIONAL GOVERNANCE ACT*
S.B.C. 2018, CHAPTER 47

AND

IN THE MATTER OF ROBERT GORDON WILSON, P.ENG., P.GEO

ENGINEERS AND GEOSCIENTISTS BC FILE T21-051

CITATION

TO: Robert Wilson, P.Eng., P.Geo.

[REDACTED]

TAKE NOTICE that a Panel of the Discipline Committee of the Association of Professional Engineers and Geoscientists of the Province of British Columbia, doing business as Engineers and Geoscientists BC, will meet on a date to be determined, for the purpose of conducting a discipline hearing pursuant to the *Professional Governance Act*, SBC 2018, c 47 (the “PGA”). The *Engineers and Geoscientists Act*, RSBC 1996, c 116 (the “EGA”) was repealed and replaced by the *PGA* on February 5, 2021. While allegations in this Citation are made under the *EGA*, the procedures established by the *PGA* and the current Bylaws of Engineers and Geoscientists BC will be followed as far as they can be adapted to this proceeding.

AND TAKE NOTICE that in connection with the preparation of a residential landslide risk assessment for the purposes of obtaining a development permit for the construction of a house located at [REDACTED], near Williams Lake, BC (the “Project”), the allegations against you are as follows:

1. You demonstrated unprofessional conduct with respect to the preparation of a report dated April 23, 2019, including a landslide assessment, in regards to the Project (the "Report"), by:
 - a. failing to refer to relevant and applicable guidelines, or the requirements set out therein, in the Report, including:
 - i. Association of Professional Engineers and Geoscientists of British Columbia *Guidelines for Legislated Landslide Assessments for Proposed Residential Developments in BC* (version revised May 2010);
 - ii. Cariboo *Regional District Development Permits Williams Lake Geotechnical Hazard Development Services Guide*;
 - iii. Cariboo Regional District *Guidelines for the Preparation of Geotechnical reports*;
 - b. failing to conduct sufficient fieldwork to reasonably evaluate the landslide hazard or risks;
 - c. failing to include in the Report relevant background information required by applicable guidelines, including:
 - i. a location plan, or topographic map or drainage map of the Project site;
 - ii. existing upslope and drainage infrastructure;
 - iii. groundwater aquifer mapping and associated reports;
 - iv. all relevant water well records and hydrogeology reports;
 - v. topographic mapping and accurate delineation of the landslide catchment area;
 - vi. changes in upslope land use; and
 - vii. surface drainages;
 - d. failing to include any maps, plans, figures, sketches, photos, or illustrations in the Report, and instead relying on outdated and uninformative Google Earth images;
 - e. failing to account for and explain to your clients nearby damage linked to slope movement and the risk it presented to the Project site;
 - f. failing to obtain, or alternatively, disregarding without explanation, information regarding the landslide rating of the Project site from the Cariboo Regional District;

- g. relying on outdated landslide assessments of the area despite being aware of more recent assessments, and diverging from the findings of more recent landslide assessments without explanation;
 - h. failing to provide an estimate of the landslide hazard or risk for the Project site, or otherwise make clear to your clients the landslide risk at the Project site; and
 - i. failing to note the existence of GPS monitoring data for the Project site and your inability to gain access to that data.
2. The conduct described in paragraph 1 is contrary to section 14(b)(1) and (2) of the Bylaws, as they stood at the time, which required that members and licensees shall establish and maintain document management processes for their practices, which shall include, as a minimum:
- 1. Retention of complete project documentation which may include, but is not limited to, correspondence, investigations, surveys, reports, data, background information, assessments, designs, specifications, field reviews, testing information, quality assurance documentation, and other engineering and geoscience documents for a minimum period of 10 years;
 - 2. Regular, documented checks of engineering and geoscience work using a written quality control process appropriate to the risk associated with the work;
3. The conduct described in paragraph 1 is contrary to the Code of Ethics, as it stood at the time, in particular:
- a. Principle 1, which required that registrants hold paramount the safety, health and welfare of the public, the protection of the environment, and promote health and safety within the workplace; and
 - b. Principle 3, which required that registrants provide an opinion on a professional subject only when it is founded upon adequate knowledge and honest conviction.

AND FURTHER TAKE NOTICE that you, Robert Gordon Wilson, P.Eng., have the right, at your own expense, to be represented by legal counsel at the hearing by the Panel of the Discipline Committee pursuant to section 79 of the *PGA*, and you or your legal counsel will have the full right to cross-examine all witnesses called and to call evidence in defence and reply in answer to the allegations.

AND FURTHER TAKE NOTICE that, pursuant to section 78 of the *PGA*, in the event you fail to attend or remain in attendance at a discipline hearing held under section 75 of the *PGA*, the Panel of the Discipline Committee may, if satisfied that you have been notified of the hearing, proceed with the hearing in your absence and make any order that the Panel of the Discipline Committee could have made in your presence.

DATED this 30 day of October, 2024.

The Investigation Committee of the Association
of Professional Engineers and Geoscientists of
the Province of British Columbia

<original signed by>

Per: Peter Helland, P.Eng.
Chair, Investigation Committee