

REGULATION OF FIRMS BULLETIN: USE OF TITLE IN REGISTRANT FIRMS

DATE OF BULLETIN

January 23, 2025

BULLETIN

Part 5 of the *Professional Governance Act* S.B.C 2018, c. 47 ("PGA") and the *Engineers and Geoscientists Regulation*, B.C. Reg. 14/2021 protects the public interest by prohibiting non-registrants from misusing reserved titles. This prohibition built upon the restriction on the use of certain titles in the now superseded *Engineers and Geoscientist Act R.B.C* 1996, c.116.

On January 13, 2025, Engineers and Geoscientists BC's Bylaws (the "Bylaws") were updated to clarify the responsibility of registrant firms in ensuring compliance with the proper use of reserved titles. This aligns the responsibility with the authority to assign titles in registrant firms. Section 5.12(22)(a) of the Bylaws states that:

- (22) "The Registrant Firm must ensure all individuals employed by or under contract with the Registrant Firm comply with the prohibitions regarding:
 - (a) the use of
 - (i) a reserved title to be used exclusively by registrants of Engineers and Geoscientists BC as set out sections 51 to 53, inclusive, of the PGA, applicable regulations, and the Bylaws, or
 - (ii) any other name, title, description or abbreviation of a name or title, or an equivalent of a reserved title or other name or title in another language, in any manner that expresses or implies that the person is a registrant of Engineers and Geoscientists BC or associated with Engineers and Geoscientists BC or is authorized to practice in a profession that is subject to a reserved title to be used exclusively by registrants of Engineers and Geoscientists BC, as set out sections 51 to 53, inclusive, of the PGA, applicable regulations, and the Bylaws, and [...]"

Section 7.7.3(1)(f) of the Bylaws requires that a registrant firm must develop and maintain a Professional Practice Management Plan ("PPMP") that contains a plan for how the registrant firm will ensure compliance regarding the proper use of reserved title within the firm.

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REGISTRANT FIRM RESPONSIBILITY

Responsible Registrants (RRs), with support of their Responsible Officers (ROs), must:

- a) Include a plan for ensuring proper assignment of titles in the PPMP,
- b) Address any misuse of title within the registrant firm, and
- c) Ensure those responsible for assigning title at the registrant firm are aware of the requirement to ensure proper use of titles within the firm.

When the individuals in charge of assigning job titles at a firm are not registrants of Engineers and Geoscientists BC, they may not be aware of these requirements. As part of their obligations under the Bylaws to ensure compliance with the PGA and the Bylaws, Responsible Registrants and Responsible Officers are required to inform these individuals of these requirements and work to achieve compliance. Regardless of a firm's policies, the restriction on use of title must be adhered to for the firm's operations in BC.

WHAT IS MISUSE OF TITLE?

Misuse of title occurs when a non-registrant of Engineers and Geoscientists BC:

- Uses one of the following expressly reserved titles:
 - "Professional Engineer" or "P.Eng.";
 - "Professional Geoscientist" or "P.Geo.";
 - o "Professional Engineering Licensee" or "P.L.Eng.";
 - o "Professional Geoscience Licensee" or "P.L.Geo.";
 - "Engineer-in-Training" or "EIT";
 - "Geoscientist-in-Training" or "GIT",
- Uses any other name, title, or description in a manner implying that they are a registrant of Engineers and Geoscientists BC, associated with Engineers and Geoscientists BC, or are authorized to practice the professions of engineering or geoscience in BC. Examples include:
 - Using "Engineer" in combination with an engineering discipline, in combination with another word related to the profession of engineering, or in combination with any language that expresses or implies the right to practice engineering;
 - Using "Engineer" on its own if the context of the use expresses or implies a right to practice engineering;
 - Using any title that implies the right to practice geoscience, including "Geoscientist", "Geologist", "Geochemist", or "Geophysicist";
 - Representing yourself as an engineer or geoscientist by applying a current or former registrant's professional seal, or a representation of a registrant's seal; or
 - Using a restricted word in a business name (including a corporation, partnership or sole proprietorship).

REQUIREMENTS FOR TRAINEES (EITS & GITS)

Engineering and geoscience trainees who are registered with Engineers and Geoscientists BC must comply with the use of title requirements under Bylaws 5.5.1 and 5.5.2, respectively. These Bylaws require, among other things, that use of a title containing the words "Engineer", "Geologist", "Geoscientist", "Geophysicist", or "Geochemist" (or other forms or abbreviations of them) must include the designation "Engineer-in-Training" (or "EIT") or "Geoscientist-in-Training" (or "GIT") in close proximity to the title and given the same or a higher degree of prominence. For example, an

EIT could appropriately use titles like "Structural Engineer, EIT" or "Engineer (EIT)", but not the titles "Structural Engineer" or "Engineer".

RESOURCES

More details on these changes can be found in FAQ #14 under Firm Practice FAQs.

Please note: resources including revised PPMP templates and addendum language to add to existing PPMPs will be made available in the coming months. We will continue to keep RRs and ROs informed of newly available resources through email communications and the "Resources and Bulletins" section of the Firm Practice Overview webpage.

EXCEPTIONS

There are regulations made under other provincial and federal legislation which entitle specific qualified individuals to the use of titles prescribed within the *Engineers and Geoscientists Regulation*. The restrictions within the *Engineers and Geoscientists Regulation* do not always apply to individuals under these other regulations, though this depends on the specific circumstances of each individual title. For example, power engineers and certain marine personnel.

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.