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I am writing to implore you to be our voice as a representative in the House of Parliament to voice my concerns.

As you may or may not be aware, the Technical Standards & Safety Authority (TSSA) is currently presenting a noticeably “light” public survey on behalf of the policy writers to move forward with an “Alternative Rules” initiative primarily focused on Path 2, to invoke a change to the Operating Engineers Act 219/01. The Institute of Power Engineers and Operating Engineers Advisory Council do not support this path during this time of crises and state of emergency in our province.

Currently, myself and many of my professional colleagues are the front-line workers who are seeing an increase in work hours due to this Covid-19 crisis. Our profession keeps critical facilities operational, be it hospitals, food manufacturing facilities, power generation plants and other key essential infrastructures. They have expressed concern about replying to this public consultation during this unprecedented and troubling time of crisis, as they do not have time to entirely understand what is being proposed.

Many of us in the Operating Engineer profession are working additional and long hours, helping educate our children at home and, like most, assessing our health and economic concerns. I feel it is very unprofessional of the Government and TSSA to be bringing forth this low weight survey with limited opportunity for comments currently.

I strongly believe, as does the Institute of Power Engineers and other vested parties, that this process should be paused until a more suitable time can be determined and when Chief Engineers and Operators, affected by this policy proposal, have the time to fully read and understand the changes being proposed. Please be advised that the TSSA has initiated a survey on only 1 of its proposed “Alternate Rules” submissions from the 25 recommendations received by the Expert Panel. This issue was identified by the TSSA Operating Engineers Advisory Committee (OEAC) as not acceptable. I believe this is being driven by the current Ontario Government and the passing of Bill 66, which encourages and promotes reducing the burden on business and industry in Ontario.

The question, in this case, is who or what are these burdens being referred to on industry by proposing and driving forward this one recommendation referred to as Path 2. One of the alternate rule’s being proposed is to reduce the practical time for Operating Engineers to become qualified as Operating Engineers. I’m not sure, but I don’t believe you would like a mechanic who works on your

car to become certified in a shorter quantity of time, so why would you favor a person who operates boilers, pressure vessels and refrigeration plants to be certified in less time.

Last year the IPE, TSSA and the Ministry of Government and Consumer Services had **somewhat** agreed on a framework for Path 1, however the focus now is the release of a Path 2 Guide. It appears to me that the TSSA, guided by the policy writers, are more focused on the intent of having plants develop a Risk Safety Management Plan (RSMP) that basically amounts to self-regulation. I hope that you can see why there **MUST** be time allocated for appropriate and vested individuals to review the proposals put forth and submit their thoughts, feelings and opinions on the future of this profession in Ontario.

I clearly understand that change in life is constant and should be expected. However, this is an example of some industry's writing their own rules in order to eliminate the prescriptive regulation that they deem to be a burden. A change in a regulation, whose sole purpose is to ensure the safe operation of power and pressure vessels in the Province of Ontario is a serious undertaking which is not often done. Ontario has proven that it has the best safety record under the existing OE regulation. The changes being proposed by the Operating Engineer Task Group regarding how plants are to be registered and operated leaves much to the imagination of the jurisdiction.

Thanks for being our voice for public safety
Sincerely,

Stationary Engineer 2nd Class



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