PROFESSIONAL SURVEYORS CANADA
GÉOMÈTRES PROFESSIONNELS DU CANADA

Utility Engineering and Surveying Institute
Canadian Chapters
Open Letter (By Email)

March 19, 2020

ATTN: Blaine Hunt, P.Eng.
Co-Chair

RE: Standards for Subsurface Utility Mapping and Engineering

Professional Surveyors Canada (PSC) is a not for profit association representing the interests of the public and Professional Surveyors across Canada. We have 1300 professional members in an industry that employs approximately 40,000 people across Canada, and as such constitute the foremost experts on land tenure, surveying, and cadastral mapping in Canada. Our mission includes the protection of the public interest as it relates to land tenure.

We understand that UESI Canada is actively advocating for the inclusion of Subsurface Utility Engineering (SUE) and Subsurface Utility Mapping (SUM) requirements in municipal requests for proposals, and in general as an effective tool in reducing the liability and cost of subsurface utility construction and maintenance. PSC shares this vision of protecting the public interest through cost savings, improved safety, and the protection of property rights.

Our membership is concerned that the current lack of standards around SUE and SUM in Canada is a detriment to the public interest and to Canadian society. The adoption of American standards to the Canadian cadastral management system would create contradictions to Canadian legislation regarding the practice of engineering and surveying. To this end, PSC proposes that standards for SUE and SUM reports should be developed with the input of our organizations, along with other key stakeholders.

PSC has published our three primary positions regarding underground infrastructure in multiple position papers and briefing notes. These positions are:

1. The installed depth of a buried facility should be at least as deep as the ground disturbance depth standard of the jurisdiction.
2. The location of all buried facilities should be surveyed in the as-constructed location and the position registered and available to the public.
3. Underground Infrastructure should not be placed on or under private lands without a registered agreement with the landowner to do so.

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Further to our positions regarding underground infrastructure, we must also be cognizant of the practice of engineering and surveying in Canada.

- The Practice of Engineering is advising or designing for a project, or directing the construction, technical inspection, maintenance or operation of any structure, work, or process. This practice is protected in Canada and can only be carried out by a licensed Professional Engineer.
- The Practice of Land Surveying is the survey of land to determine or establish boundaries or to determine or report on the location of anything relative to a boundary for the purpose of certifying the location of the thing. This practice is protected in Canada and can only be carried out by a licensed Professional Surveyor.

To this end it is very important to identify where professional surveyors and professional engineers are required. The use of the term "Engineering" is limited to elements of design that are protected practice according to engineering legislation. In similar terms the location of boundaries and object in relation to those boundaries is protected by land surveying legislation. To this end, it is imperative to not associate the term "SUE" or "Subsurface Utility Engineering" with reports or professional work that does not include the defined practice of engineering. This protects the public through an established trust that the name of a professional service, and the inclusion or exclusion of the protected terms of Land Surveying or Engineering, clearly defines the nature of that service. It is important that professionals do not use the trust conferred upon them by the public, to limit practice of unregulated professionals.

We believe that the use of the terms SUE and SUM can clearly identify to the public what services are engineering, and what services are not. In a similar fashion, we expect that SUE or SUM documents that define the legal boundaries of land or rights-of-way are to be certified correct by a professional surveyor. In cases where a SUE report defines boundaries, both professionals should be required to certify the report.

This is where standards for SUE and SUM reporting developed by our organizations will have a key role in serving the public interest. Through clear standards and branding, government and public entities can rest assured that they are receiving a product or service to a clear and unbiased standard, ultimately saving cost, time, and lives through the precise knowledge of the nature and location of buried utilities.

PSC commends UESI Canada on your attention to the importance of subsurface utility engineering and surveying in protecting the public. We look forward to meeting with you to this end. You can find out more about PSC and our positions by visiting www.psc-gpc.ca.

Yours truly,

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