

MS comments Template

QF003 Reference #: CQ/2025/0360	Document: DCRCP 11 202X- Professional Engineering Services- Registration and Practice- code of practice
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1	2	(3)	4	5	(6)	(7)
MB¹	Clause No./ Subclause No./ Annex / Figure / Table	Line Number	Type of comment²	Comment (justification for change) by the MB	Proposed change by the MB	RTC observations on each comment submitted
SR	Forward & 1c)	FW: 2 nd par. 1c)	te	See also the reaction on Given the overarching objective as per Forward (2 nd paragraph), it is unclear how “ongoing continuing professional development is framed. Moreover, it is left to the country’s body dealing with standards, and their portfolio on provided training. Better to include “ongoing” experience in the field of engineering by means of CV proof.	c) The minimum annual levels of ongoing Continuing Professional Development, following track record development, and/or additional training, to be satisfied by practising professionals in engineering.	Accepted with modification (AWM)
GY	Foreword & Scope	pp. viii–1 (lines 1–25)	te	There is no mention of regional enforcement framework. The focus is on principles but not on compliance structures.	Add an Annex on Enforcement and Disciplinary Procedures including how breaches will be investigated, sanctioned, and appealed by establishing the following: Complaints handling system, Investigative procedures by national/regional boards, and Sanctions: warning, suspension, removal from register, fines and the Right to appeal. Clarify whether enforcement is national or regional.	Not accepted

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SR	3.2	Whole paragraph	te	It is assumed that here also “vocational level” trained “engineering technicians are included. In order to balance with chapter 4, proposed to include “vocational” in the definition.	An engineering technician is a skilled professional, of minimal vocational or equivalent level, who supports engineers in the design, development, and maintenance of technical systems and products. They apply their technical knowledge and practical skills to assist in various stages of engineering projects, ensuring that specifications and standards are met.	accepted
GY	Qualifications	Section 4.1.2– 4.1.3, p. 2–3 (lines 12–30)	te	There is no recognition of equivalent international accreditation frameworks (e.g. ABET, NAAB, Engineers Canada).	Establish mutual recognition agreements with partner bodies for professional mobility Create an equivalency/recognition framework for international programs (ABET, NAAB, RIBA, Engineers Canada, etc.). Use existing CARICOM standards if applicable as well	AWB as edited
GY	Professional Engineer	4.1.2	te	Are only Masters of Engineering (MEng) accepted? What about Master of Science in Engineering (MSc)?	Consider the acceptance of both.	Accepted

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SR	4.1.2	Whole	te	Unclear why a B.degree requires only a “standard accreditation” (at least that is the suggestion), whilst an M.Eng requires an “appropriate accreditation”, and a PhD requires an accreditation by a “licensed professional engineering institution”. Is it not better to keep one description for all?	Consider using one accreditation description for all:	Accepted
SR	4.1.2		te	We support the requirement for an accredited Bachelor of Science (BSc.) degree in Engineering or Bachelor of Engineering (B.Eng) as the minimum entry point for registration, but not the Bachelor of Technology (B.Tech) in Engineering.	We also recommend explicit recognition of regional accreditation agencies (such as NOVA in Suriname and equivalent national bodies across CARICOM) within the text, to ensure clarity for implementation	Not accepted
SR	4.1.3		te	The minimum of two years of accredited experience is reasonable.	The draft could be strengthened by explicitly recognizing structured internship arrangements between universities and industry as part of early professional development.	Not accepted

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TT	4.1.3		te	The Board of Engineering of Trinidad and Tobago (BOETT) generally concurs with the contents of the Draft Regional Standard for Professional Engineers Code of Practice, with the exception of Section 4.1.3 - Experience, which suggests two years accredited experience as being sufficient to acquire the necessary competency and proficiency that rise to the level of professional practice and equates with the requirement for professional registration/Licensing. Attached for your information are three current BOETT Documents which are the BOETT Registration and Licensing Process, CPD Quick Guide and Operational Guidelines of the CPD Committee.	The BOETT is of the view that a period of practice of no less than four years after graduation from an accredited engineering programme should be the minimum standard for Registration /Licensing of a Professional Engineer.	Accepted

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GY	Continuing Professional Development (CPD)	Section 4.2, p. 3 (lines 31–45)	te	There is no mention of quantitative requirements (e.g., hours/credits). No recognition of informal/industry-based learning.	Define minimum CPD hours per year (e.g., 30 hrs or equivalent credits). Categorize CPD activities (formal training Define acceptable CPD categories: Formal training / workshops. Technical papers or publications. Industry projects / professional practice. Community/civic technical service. Require engineers to maintain a CPD logbook which is subjected to periodic audit by registration bodies.	AWB as edited
LCA	Section 4.2 and 6.7	157-165 425-440	Ge	Continuing Professional Development (CPD) Repeated Sections: Specific Requirements (4.2) and Professional Obligations (6.7) both mention: The importance of CPD for engineers. The requirement for ongoing training to maintain professional registration. The role of professional associations in approving CPD courses.	Suggested Fix: Keep the CPD section under "Specific Requirements" (Section 4.2) and remove the repetition from Professional Obligations (6.7). Include a recommended CPD hours per year guideline to eliminate vagueness.	Not accepted Accepted

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SR	4.2	Whole paragr.	te	See also item 1. The re-licensing is strictly linked to “training” and zero on “progression of engineering” following progression in the execution of engineering jobs. Thus, a junior engineer keeps his registration because he takes a basic FIDIC contracting training, whilst a senior engineer may lose his registration, cause he is busy on managing a \$300M Highway & bridge project. It is proposed to include “appropriate and validated” CV development as part of the re-licensing framework. Also who “approves” the “pre-approved” courses as listed in this paragraph?	Engineer should maintain and develop..... Engineers may also propose a course not on the list. It should be subject to approval. Subsequently, the licensing body may also use the Curricula Development of the Engineer as evaluation reference for their re-licensing, assuming sufficient development is clear since the last license renewal. Development to show increase in responsibility, project scope increase, complexity increase, and such like developments.	Not accepted
SR	4.2		ge	We support the requirement for mandatory CPD.	To ensure effective implementation, CPD should be tied to pre-approved regional programs, with room for recognition of other relevant courses subject to approval by the registration body.	superceded
SR	5		te	We endorse the principles set out in this section.	In addition, we suggest that the Code make explicit reference to climate resilience and disaster preparedness as key aspects of engineering practice in CARICOM.	Not accepted

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LCA	Section 5 and 6	167-319 320-473	ge	Ethical Principles & Professional Conduct Repeated Sections: Rules of Practice (Section 5) and Professional Obligations (Section 6) Both sections state that engineers should: Conduct themselves with honesty, integrity, and professionalism. Not misrepresent their qualifications. Not accept bribes, gifts, or compensation that could influence their judgment. Comply with engineering standards and laws.	Merge both sections under a single "Code of Ethics and Professional Conduct" section. Use bullet points for easier readability.	Accepted
GY	Rules of Practice – Fundamental Principles	Section 5.1–5.6, pp. 3–5 (lines 46–110)	ed	There are some duplication across sections (truthfulness, client communication). Limited coverage of digital/AI-related ethical issues.	Add sub-clauses under 5.1 and 5.6: Engineers must ensure data security, privacy, and responsible use of AI/digital tools in engineering practice. Engineers must be competent in sustainable and digital innovations relevant to their discipline.	Accepted with modications as edited

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LCA	Section 5.1, 5.3, 6.1 and 6.8	169-189 214-229 323-344 443-452	Ge	Engineers' Responsibility for Public Safety Repeated Sections: Rules of Practice (5.1, 5.3) and Professional Obligations (6.1, 6.8) Engineers should: Prioritize public safety in all professional activities. Report hazards or non-compliant work. Avoid signing off on work beyond their competence.	Suggested Fix: Combine into a "Public Safety and Engineering Accountability" section. Introduce a reporting mechanism for safety violations.	accepted
SR	5.1.3		te	What if practical conditions differ from applicable standards? Eg: in the interior it is difficult to test concrete. So engineers should not approve documents from a contractor?	Engineers should approve those documents that are in conformity with applicable standards and best engineering practices.	Accepted

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LCA	Sections 5.4, 5.6, 6.5 and 6.9	231-278 307-319 398- 407 454-473	Ge	Conflict of Interest Repeated Sections: Rules of Practice (5.4, 5.6) and Professional Obligations (6.5, 6.9) Engineers: Should disclose conflicts of interest before accepting projects. Should not accept financial benefits that could compromise judgment. Should not participate in projects where they have a vested financial interest without disclosure.	Suggested Fix: Create a standalone "Conflict of Interest and Financial Ethics" section. Use case-based examples to clarify acceptable vs. unacceptable scenarios.	Superceded
LCA	Section 5.4 and 6.4	231- 275 382-395	Ge	Confidentiality & Client Relations Repeated Sections: Rules of Practice (5.4) and Professional Obligations (6.4) both state that engineers: Should not disclose confidential information without consent. Should not use privileged client information for personal or professional gain. Should protect proprietary work, intellectual property, and sensitive engineering data.	Suggested Fix: Consolidate into a "Confidentiality and Intellectual Property" section. Use a table or bulleted format for different types of sensitive information.	superceded

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GY	Duties to Clients	Section 5.4.1–5.4.13, pp. 4–5 (lines 80–105)	te	No guidance on standard contracts, dispute resolution, or arbitration in engineering services.	Include requirement to use standard forms of contract (e.g., FIDIC) or establish a CARICOM model contract. Client obligations are clear, but transparency measures can be strengthened. Require engineers to publicly declare conflicts of interest when acting on public contracts. Mandate disclosure of gifts, sponsorships, or consulting income above a set threshold. Require adoption of standard forms of contract (e.g., FIDIC, CARICOM model forms) for public projects.	Not accepted
LCA	Section 5.5 and 6.3,6.6	281-305 370-380 409-421	Ge	Misrepresentation & Fraudulent Practices Repeated Sections: Rules of Practice (5.5) and Professional Obligations (6.3, 6.6) Engineers should: Not misrepresent qualifications or exaggerate experience. Not engage in deceptive advertising or self-promotion. Not provide false or misleading technical reports.	Suggested Fix: Merge into a "Misrepresentation and Deceptive Practices" section. Define penalties for violations instead of stating the rule multiple times.	superceded

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GY	Avoidance of Deceptive Acts	Section 5.5.1–5.5.4, p. 5 (lines 106–120)	te	Lacks detailed reporting mechanisms for suspected corruption	Add whistleblower protection clause; mandate reporting channels (national boards or regional body). Add whistleblower protection clause allowing engineers to report corruption without retaliation. Establish a confidential reporting channel at the national or regional engineering council level.	Not accepted
BS	5.6	1	te	Shall would be a better choice than should since these clauses involves the welfare of other humans.	Engineers shall conduct themselves...	Accepted
SR	5 and 6	Whole chapters	ge	What happens if an engineer acts contra a sub-code or obligation? Will he lose his registration directly after such fact comes to light? Or at renewal? The code has no sanctions listed. Is that the purpose? E.g. take 6.1.3 (accept work outside your employer). If this has occurred and the Employer informs the licensing body – what happens?	Institutional position needed if sanctions also need to be part this code.	Not accepted

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LCA	Sections 5.7, 5.8, 6.7 and 6.9	425-440 454-473	Ge	Engineers' Conduct Toward Colleagues Repeated Sections: Rules of Practice (5.7, 5.8) and Professional Obligations (6.7, 6.9) Engineers should: Treat colleagues with fairness and respect. Avoid professional defamation or malicious criticism. Acknowledge the contributions of others in technical work.	Suggested Fix: Create a "Professional Relationships and Workplace Conduct" section.	superceded
SR	6		te	The provisions on transparency, conflict of interest, and fair practice are appropriate.	A short clause could be added to acknowledge the role of higher education institutions in preparing graduates to meet these professional obligations before registration.	Not accepted. Code is not to tell educational institutions what to do
GY	Professional Obligations	Section 6.1–6.9.4, pp. 5–8 (lines 121–185)	te	Overlaps with “Rules of Practice.” Enforcement not defined.	Merge overlapping provisions with Section 5. Add disciplinary procedures and penalties for breaches (e.g., fines, suspension, removal from register).	Superceded with merging of sect 5 and 6

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BS	6.2	1	te	Shall would be a better choice than should since these clauses involves the welfare of other humans.	Engineers shall	accepted
BS	6.22	1	te	Shall would be a better choice than should since these clauses involves the welfare of other humans.	Engineers shall	accepted
BS	6.3	1	te	Shall would be a better choice than should since these clauses involves the welfare of other humans.	Engineers shall	accepted
BS	6.3	1	te	Shall would be a better choice than should since these clauses involves the welfare of other humans.	Engineers shall	accepted
GY	International Practice	Subclause 6.4.3, p. 7 (lines 160–165)	te	No mention of reciprocity or recognition for CARICOM engineers abroad.	Develop reciprocity agreements with partner bodies outside CARICOM (e.g., Engineers Canada, ICE UK). Add reciprocal provisions enabling CARICOM engineers to register abroad through recognition agreements. Establish a CARICOM Professional Engineers Register to standardise mobility across member states.	Not accepted. This is not document for reciprocity , a separate document dealing with this as it relates to engineering is being developed.

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GY	General Document Structure	Bibliography & General Notes, p. 8 (lines 186–end)	ed	Limited bibliography (only one web source cited). Language occasionally repetitive.	Expand bibliography to include the following and edit for conciseness and clarity. FIDIC Code of Ethics UNESCO Engineering Report WFEO Model Code of Practice Engineers Canada Guidelines NAAB, RIBA, ICE UK standards	Accepted.
SR	6.7.1		ge	It shouldn't be a problem when the same client asked an engineer to review another engineers work		Not accepted. No proposed change. Clause states disclosure is necessary.

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