

**Professional Engineers  
Ontario**

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February 18, 2003

The Honourable David Young  
Attorney General of Ontario  
Queen's Park  
720 Bay Street, 11th Floor  
Toronto ON M5G 1K1

Dear Minister:

This letter is to advise you that at its meeting of January 23, 24, 2003, the Council of Professional Engineers Ontario endorsed the PEO staff comments regarding the proposed *Act to Enhance the Practice of Safe Interior Design*. These comments were contained in our letter of January 15, 2003 to Susan Wiggins, Chief Administrative Officer, Association of Registered Interior Designers of Ontario, on which you were copied.

In particular, Council wishes to emphasize PEO's concern regarding the proposed Act's definition of the "practice of interior design." This concern is founded in our belief that interior designers may not have sufficient knowledge about mechanical, electrical and structural engineering to be able to judge whether their designs would affect or be likely to affect these systems. Since the exclusions to the definition of the "practice of interior design" depend on interior designers being able to exercise this judgment, there is significant risk of their practising within the scope of the draft definition's exclusions (e) and (f), which we believe to be the practice of professional engineering.

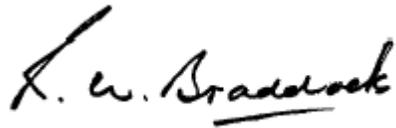
PEO also remains concerned with the inclusion of a definition of "design" in the proposed legislation, separate from the definition of the "practice of interior design". We believe that including both definitions can only increase the potential for interior designers to practise in areas that constitute the practice of professional engineering. You will note that the *Professional Engineers Act* does not define "design" except within the context of the overall definition of the practice of professional engineering. We would encourage ARIDO to do likewise and also to define more precisely what constitutes the practice of interior design. The definition should be as distinct as possible from the definition of professional engineering to mitigate the potential for PEO enforcement action against registered interior designers.

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We hope that this letter and PEO's earlier comments will be of assistance to you in considering the proposed *Act to Enhance the Safe Practice of Interior Design*. We would be pleased to discuss these issues further with you or your staff at your convenience.

Sincerely,

A handwritten signature in black ink that reads "R. W. Braddock". The signature is written in a cursive style with a horizontal line underlining the name.

Richard W. Braddock, P.Eng.  
President

RWB/cm

Copies:       John Twohig, Senior Policy Advisor, Ministry of the Attorney General  
                  Moshe Morris, Policy Advisor, Justice Issues, Ministry of the Attorney  
                  General  
                  Susan Wiggins, Chief Administrative Officer, Association of Registered  
                  Interior Designers of Ontario