



March 24, 2026

Sent via e-mail

Melanie Siewert  
Chief Executive Officer  
Professional Geoscientists Ontario  
155 University Avenue, Suite 302  
Toronto ON M5H 3B7

Dear Ms. Siewert:

**Re: Decision on Parallel Processing Plan Submitted by the  
Professional Geoscientists Ontario  
Our File Number: PPP 14**

I am enclosing my decision with respect to the application submitted by Professional Geoscientists Ontario ("PGO") to approve its parallel processing plan (the plan) pursuant to subsections 12.1(3) and (5) of the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* ("FARPACTA" or "the Act").

After reviewing the plan and the information that PGO has provided, I have determined that the plan meets the legal requirements set out in FARPACTA and Ontario Regulation 261/22 made under the Act.

Accordingly, I have approved this application. My reasons for this determination are set out in the enclosed decision.

Thank you for your organization's constructive engagement in this process.

Yours truly,

A handwritten signature in black ink, appearing to read "Irwin Glasberg".

Irwin Glasberg  
Fairness Commissioner

cc: Mariela Orellana, Director  
James Mendel, Compliance Analyst

**Office of the Fairness Commissioner  
Request for Approval of Parallel Processing Plan  
Professional Geoscientists Ontario  
Our File Number: PPP 14**

**Decision**

**Nature of the Application:**

This decision pertains to an application brought by Professional Geoscientists Ontario (“PGO” or the “regulator”) for me, as Fairness Commissioner, to approve its parallel processing plan (the “plan”) pursuant to subsections 12.2 (3) and (5) of the *Fair Access to Regulated Professions and Compulsory Trades Act, 2006* (“FARPACTA” or “the Act”).

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After reviewing the plan and considering all the information that PGO has provided, I have determined that the regulator’s plan fulfills the legal requirements contained in both the Act and Ontario Regulation (O. Reg.) 261/22 made under the Act (the “regulation”).

Thus, my decision is to approve this application. My reasons for this determination are set out below.

**Analysis:**

*The Relevant Legal Framework*

On October 28, 2024, the *Working for Workers Five Act, 2024* received Royal Assent. Among other things, this bill added new provisions to FARPACTA that impose a legal obligation on each regulated profession to establish a parallel processing plan. The accompanying regulation also specifies that the plan must address specific elements and be submitted to the Fairness Commissioner for review and approval.

Given that I must determine whether regulator’s plan incorporates each of the required legal obligations, I will first summarize these provisions.

Under subsection 12.2 (1) of the Act, a regulated profession is required to have a plan to address how it will enable multiple registration processes to take place concurrently -- what I will subsequently refer to as Legal Obligation no. 1.

Pursuant to subsection 12.2 (2) of the Act, such a plan must:

- Permit applicants who experience a delay in one part of the registration process to proceed with other parts of the registration process wherever possible. (Obligation no. 2)

- Comply with any requirements set out in the regulations respecting how the plan must address the matters described in the first two points listed above. (See discussion below)

Section 4.2 of the regulation further particularizes the requirements that the regulator's parallel processing plan must fulfill. It provides that a plan must:

- Include steps that set out how the regulated profession will enable registration processes to take place concurrently, where feasible, including when there are delays. (Obligation no. 3)
- Include information about the circumstances in which the regulated profession will allow an applicant to choose whether to have different parts of their registration processes occur sequentially or concurrently. (Obligation no. 4)
- Contain information about how the regulated profession will ensure that an applicant has reasonably sufficient information to allow the applicant to make an informed choice, including information about the cost of examinations, tests and assessments and the number of permissible attempts on examinations, tests, and assessments. (Obligation no. 5)

Shifting to the approvals process for such plans, subsection 12.2 (3) of FARPACTA then stipulates that a regulated profession must submit the plan to the Fairness Commissioner for review. Pursuant to subsection 12.2 (4), a regulated profession is also required to submit an updated plan to the Fairness Commissioner for review whenever there is a change in circumstances that may affect the plan.

Subsection 12.2 (5) goes on to provide that, before implementing a plan or updated plan, a regulated profession shall:

- (a) respond to any input from the Fairness Commissioner regarding the plan or updated plan; and
- (b) if the regulations so provide, obtain the Fairness Commissioner's approval of the plan or updated plan or implement the changes to the plan or updated plan required by the Fairness Commissioner.

Subsection 12.2 (6) further obliges the Fairness Commissioner to comply with any regulations prescribing the process for approving a plan or updated plan. Such provisions have been set out in section 4.3 of the regulation. Subsection 4.3 (1) of the regulation specifically provides that the approval of the Fairness Commissioner must be obtained in respect of a plan or updated plan.

Under paragraph 1 of subsection 4.3 (2) of the regulation, upon receipt of a regulator's parallel processing plan, the Fairness Commissioner shall review the document and either:

- approve it,
- require additional information from the regulated profession, or
- respond to the regulated profession with an explanation of what changes are required for approval and a statement that approval is contingent on the required changes being made.

By virtue of paragraph 2 of subsection 4.3 (2), the Fairness Commissioner is obliged to consider any input provided by the regulated profession.

Finally, subsection 4.3 (3) of the regulation requires that a regulator submit its plan to the Fairness Commissioner for approval no later than January 1, 2026.

To summarize these provisions, each regulated profession is required to submit a parallel processing plan to the Fairness Commissioner by the specified date. The regulator must ensure that its plan satisfactorily incorporates each of the legal obligations outlined in the Act and regulation.

The role of the Fairness Commissioner is, in turn, to review the plan and to either (1) approve it, (2) require additional information or (3) advise the regulator of the changes required for approval and indicate that approval is contingent on making the required changes.

In seeking the Fairness Commissioner's approval of its parallel processing plan, the regulated profession bears the onus of establishing that the plan incorporates each of the prescribed legal obligations.

My interpretative lens will be to confirm that each obligation has been fulfilled in a satisfactory way and that the regulator has turned its mind to this exercise in a conscientious fashion.

#### *My Evaluation of the Regulator's Plan and Submissions:*

On December 18, 2025, PGO submitted an early version of its parallel processing plan to staff of the Office of the Fairness Commissioner (the "OFC") to undertake an informal review. Staff then provided several suggestions to make the plan adhere more closely to the requirements in the Act and regulation. The regulator subsequently adopted these proposals.

On March 18, 2026, the president of PGO's council approved this plan, which our office received promptly on March 20, 2026. I have attached this document entitled "Parallel Processing Plan" as Appendix "A" to this decision.

I have carefully reviewed the contents of this plan in conjunction with the legal obligations contained in the Act and regulation and can confirm that the plan satisfactorily addresses each of the five prescribed legal requirements.

To its credit, PGO has historically been a leader among regulated professions in applying progressive parallel processing practices. For example:

- An applicant seeking licensure as a geoscientist can work towards meetings each of PGO's five registration requirements individually, or concurrently.
- The regulator allows an applicant to earn work experience while enrolled in an undergraduate or post-graduate geoscience program. (For example, someone who has completed two years of a BSc degree, can qualify for up to 12 months of work experience, towards the required total of 48).
- The sphere of permitted work experience is very broad and can encompass summer employment, internships and coop experience.

I appreciate the extra efforts that the regulator has taken to develop a comprehensive, client-focused plan.

**Decision:**

Following a careful review of PGO's parallel processing plan, as approved by its council president, and in conjunction with my analysis of the pertinent legal obligations and the considerations that I have outlined above, I find that the regulator's plan satisfactorily addresses each of the identified legal obligations outlined in the Act and regulation.

Therefore, I hereby approve PGO's plan entitled "*Parallel Processing Plan*", which is enclosed as Appendix "A" to this decision.



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Irwin Glasberg  
Fairness Commissioner

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March 24, 2026



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### Parallel Processing Plan

#### Section I: Statutory Requirement

Section 12.2 of FARPACTA reads as follows:

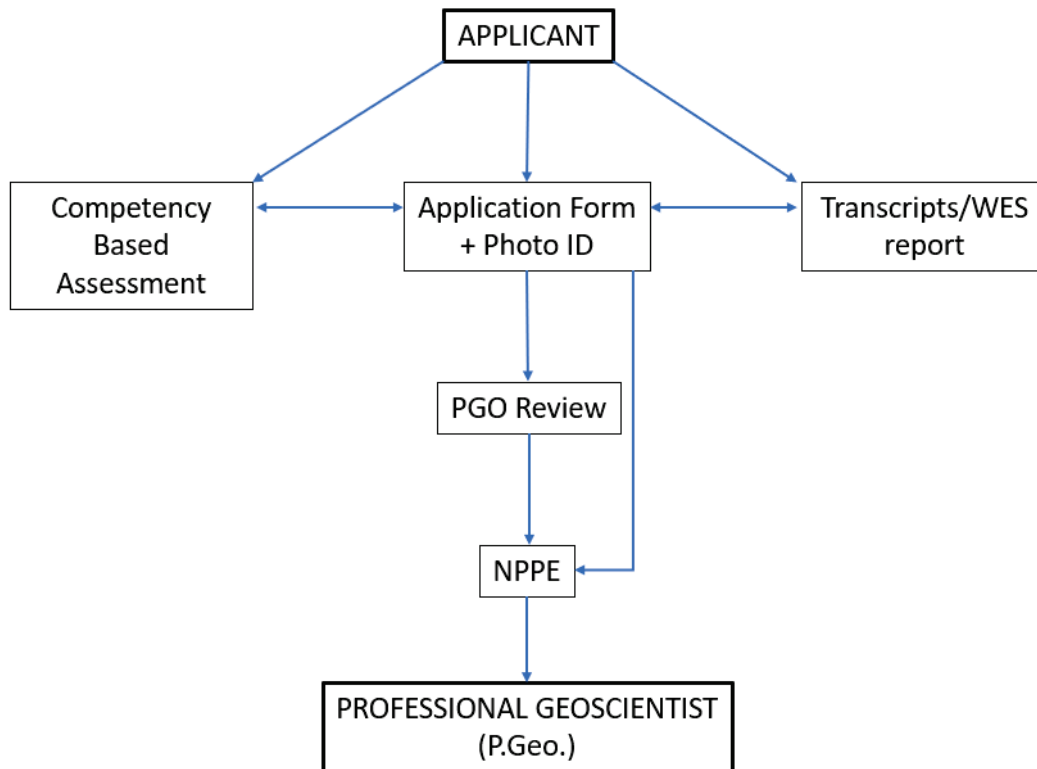
- (1) A Regulated profession shall have a plan addressing how it will enable multiple registration processes to take place concurrently.*
- (2) The plan must permit applicants who experience a delay in one part of the registration process to proceed with other parts of the registration process wherever possible.*

PGO's Act and Regulations were designed to allow for the requirements for registration to be fulfilled concurrently. As such, processes compliant with Section 12.2 (2) of FARPACTA were fully implemented prior to the current regulatory updates.

PGO's parallel processing plan allows applicants for the professional designation to complete multiple steps concurrently. The requirements for professional registration include the following components:

1. Submission of an application form, which creates an account in the PGO system for the applicant and allows staff to input data when documents are received;
2. Submission of redacted photo identification, which forms part of the application form to allow staff to confirm the identity of the applicant;
3. Submission of educational transcripts, including a course-by-course Canadian equivalency evaluation from World Education Services (WES), where required for non-Canadian transcripts. Transcripts are required to allow staff to evaluate that the applicant meets the prescribed knowledge requirements;
4. Submission of a competency-based assessment (CBA) to demonstrate a minimum of four years of geoscience work experience;
5. Successful completion of the [National Professional Practice Examination \(NPPE\)](#), which is the entry to practice exam for all geoscientists and engineers across Canada, with the exception of Quebec.

The following flow chart shows each of the requirements and how they can be completed in an order that the applicant chooses:



An applicant for professional licensure can work on each of the above requirements individually, or concurrently. This allows for applicants to begin documenting their work experience, as well as ordering transcripts, and preparing to sit the NPPE exam either concurrently or progressively. The application form must be submitted before an applicant is eligible to write the NPPE exam; however, applicants have two years to complete the exam once the application has been submitted. The application form does not require that the transcripts and CBA be submitted at the same time; therefore, these do not need to be completed before the submission of the application form.

In working towards the qualifications for entry to practice, PGO allows for work experience to be earned while in education, and for post graduate education. Those who are in a bachelor's of science program, in an area of geoscience, can earn up to 12 months of work experience, after the completion of their second year, towards the required 48 months. This work experience can be from summer employment, from coop experience or from internships. If the applicant completes a master's degree or PhD program in an area of geoscience, they can also earn up to an additional 12 months of work experience, for each degree, upon completion.

An individual who meets the educational requirements, but does not meet the experience requirements can register for the Geoscientist-in-Training (GIT) designation. This allows individuals to confirm that they meet the educational requirements as they are entering the workforce, and signals to employers that these applicants are qualified and will be eligible for their professional designation once they meet the work experience requirements.

If an applicant does not meet the educational requirements when they graduate, but are working in a geoscience position, they can complete the educational requirements at the same time as earning work experience. This is where applying as a GIT is beneficial, as individuals will find out early in the process whether they meet the educational requirements, or not.

Ontario Regulation 324/16 “Registration” made under the Professional Geoscientists Act, 2000 allows for these requirements to be completed concurrently; therefore, no changes are required to PGO’s management of applications to satisfy FARPACTA requirements.

It is possible for delays to occur in the process for several reasons:

1. Transcripts: All internationally trained applicants are required to have their universities send their transcripts directly to WES. Depending on the country of origin, this can take extra time, and sometimes there is a requirement for the individual to make the request to the university in person. It normally takes up to a month for transcripts to get to WES, but in some instances, it can take longer. Once WES receives the required documents, the evaluations are usually completed within a couple of weeks. During this time, the individual can work through their CBA assessment, and register for the NPPE exam.
2. CBA: When an applicant submits their CBA assessment, it is automatically sent to the individuals that they have asked to validate their work experience. Validators usually complete their part within a couple of weeks, but it can take longer if a validator has other commitments. The CBA system sends out regular reminders to complete the validation process; however, if this process takes longer than normal for a validator to complete, PGO staff will reach out to the applicant and ask them to follow up with their validator. In some cases, an alternate validator can be selected, if the original validator is no longer available. While the validation process is ongoing, the applicant can apply for and begin to study for the NPPE exam.
3. NPPE: Exams are held [five times per year](#). While this part of the process is within the applicant’s control, it can create delays in registration if the applicant is not successful in completing the exam during their first attempt. Some applicants will choose to wait until their application has completed the review process before applying to write the exam, which delays their registration to practice. Both of these scenarios are under the applicant’s control. PGO staff encourage applicants to apply to write the exam as soon as they are eligible, to enable them to be registered once all of the other requirements are fulfilled. The NPPE exam does not expire and is good for life; therefore, once an applicant has passed the exam, the result remains in their file until all other requirements are met, and they can be registered for their professional designation.

## **Section II: Supporting Data and Consultation**

As detailed in Section I, PGO’s registration processes already meet the legal obligations as set out in FARPACTA and there have been no changes to the way the PGO processes applications in the last few years; therefore, there is no consultation planned.

### **Section III: Regulatory Requirements for Concurrent Processing**

Sections 4.2 of the Ontario Regulation 261/22 made under FARPACTA states that a parallel processing plan must include:

- (a) Steps that set out how the regulated profession will enable registration processes to take place concurrently, where feasible, including when there are delays;*
- (b) Information about the circumstances in which the regulated profession will allow an applicant to choose whether to have different parts of their registration processes occur sequentially or concurrently.*

PGO's registration processes already meet the legal obligations as set out in FARPACTA. Section I provides a summary of how PGO's registration process allows applicants to complete multiple processes concurrently and identified several examples of how possibly delays are managed within these processes.

The registration requirements are available to all applicants, to complete in any order that they choose, with the exception of the NPPE, and are described on the PGO website.

Implementation Plan: Not Applicable.

### **Section IV: Regulatory Requirements for Communications to Applicants**

Section 4.2 of Ontario Regulation 261/22 made under FARPACTA states that a parallel processing plan must include:

- (c) Information about how the regulated profession will ensure that an applicant has reasonably sufficient information to allow the applicant to make an informed choice under clause (b), including information about the cost of examination, tests and assessments and the number of permissible attempts on examinations, tests and assessments.*

Information is provided on the PGO website, and in the guidelines for registration. These details provide applicants with the steps required for registration, and inform them that the steps can be completed concurrently. Information is also provided to applicants through email when requested.

Applicants are contacted as each step of the process has been completed. Applicants receive automatic confirmations when they submit their application, and when their CBA has been validated. Applicants receive email confirmations from PGO staff upon receipt of transcripts and any other required documents. When all documentation has been received, applicants are informed of that fact, and given an approximate timeframe for a registration decision to be reached.

The ability for applicants to submit documents and prepare their application also allows for them to manage the costs of the application. By completing one stage at a time, an applicant can pay for their transcripts/WES report at a separate time from submitting the application form and

associated fees. The cost of the CBA assessment is included in the application fee. If an applicant wants to manage their costs further, they can choose to wait for their review by PGO before applying for the NPPE. Only once all requirements are met, will the individual be invoiced for the annual dues amount.

Communication Plan: Not Applicable.

### **Section V: Monitoring, Evaluation and Updates**

No changes are being implemented to comply with the new FARPACTA legislation; therefore, no monitoring is required.

PGO's legislation allows for the parallel processing of documents, and is able to comply with all requirements legislated by FARPACTA.

Approved on March 18, 2026, by:



Eilidh Lewis, M.Sc., P.Ge.  
Registrar



Melanie Siewert, P.Ge. (Limited)  
CEO



Robert Hearst, P.Ge. PGO Council President