

Professional Association Audit Report – BC Institute of Agrologists

1. Introduction

This report is one component of the Professional Reliance Review announced by the Minister of Environment and Climate Change Strategy George Heyman in October 2017. The Province is conducting a review of the professional reliance model of the natural resource sector to ensure the highest professional, technical and ethical standards are being applied to resource development in British Columbia. The Review has several components, including assessing the enabling legislation and performance of professional associations that govern qualified professionals, including the BC Institute of Agrologists (BCIA), the Applied Science Technologists & Technicians of BC (ASTTBC), the College of Applied Biology (CAB), the Engineers and Geoscientists of BC (EGBC), and the Association of BC Forest Professionals (ABCFP). This report provides the results of an examination of the BC Institute of Agrologists.

Professional reliance takes different forms across the natural resources sector, but in general terms is a regulatory model in which government sets the natural resource management objectives or results to be achieved, and professionals hired by proponents decide how those objectives or results will be met. Generally, government oversight focuses on monitoring, compliance and enforcement, rather than reviewing and approving plans or project designs. In doing so, government relies on the professionalism of the qualified professional (QP), the professional and ethical codes they are required to follow, and oversight by the professional associations to which they belong.

The Professional Reliance Review will make recommendations on:

1. Whether professional associations that oversee QPs employ best practices to protect the public interest;
2. Whether government oversight of professional associations is adequate; and
3. Conditions governing the involvement of QPs in government's resource management decisions and the appropriate level of government oversight to assure the public their interests are protected.

2. Approach and Scope

A multi-agency government team of 4 members met with representatives of BCIA to discuss how the association is meeting its obligations under the *Agrologists Act (Act)*, and a number of issues relating to professional governance and professional reliance. A number of questions were provided in advance, and BCIA provided considerable information and document both before and during the interview, which was held on November 22, 2017.

The focus of this report is to assess whether and how BCIA is meeting its obligations under the *Act*, to help inform the Professional Reliance Review's consideration of Issue #1 above. The assessment includes issues such as: standards of enrollment, including continuing professional development and maintaining competency; code of ethics, including conflicts of interest; standards of professional conduct; and liability and professional negligence.

The interview team considered the current legislation, Bylaws, formal submissions from BCIA, documents publically available on BCIA website, and the information from interviews with BCIA staff. This report does not address whether the *Act*, council Bylaws or BCIA policies and procedures employ best management practices to protect the public interest, but provides important information for that evaluation. This report is one part of a broader review that will consider comments from professionals, members of the public, government employees, and other professional regulators and governance experts, all of which will inform any recommendations that result from the project.

3. BCIA Governance Context

In April 1947, the BC legislature passed the *Act*, creating the British Columbia Institute of Agrologists and continued by the current *Act*, which came into force in 2003. The *Act* gives the Institute the authority to make regulatory and administrative Bylaws, which are approved by the Institute's members. BCIA Bylaws were adopted May 12, 2004. Amendments to the Bylaws (including Schedules) were approved by Council on Dec. 22, 2017 and came into effect January 1, 2018.

Agrology is broadly defined in the *Act* to mean "using agricultural and natural sciences and agricultural and resource economics, including collecting or analyzing data or carrying out research or assessments, to design, evaluate, advise on, direct or otherwise provide professional support to:

- a) The cultivation, production, improvement, processing or marketing of aquatic or terrestrial plants or animals, or
- b) The classification, management, use, conservation, protection, restoration, reclamation or enhancement of aquatic or terrestrial ecosystems that are affected by, sustain, or have the potential to sustain the cultivation or production of aquatic or terrestrial plants or animals."

Persons who hold themselves out to be an agrologist must be a member in good standing of BCIA.

BCIA is comprised of its members and a council that governs and administers the affairs of the Institute. As required by the *Act*, the council consists of a minimum of 5 councilors elected by practicing members and up to 3 non-members appointed by the Minister of Agriculture; a president and one or more vice president(s) elected by members; and the immediate past president. At the time of this audit, the Minister has not appointed any lay members. BCIA currently has about 1,250 practicing members who are professionals in multiple areas including agriculture, food production, environment and resource management. Within government, the *Act* is the responsibility of the Ministry of Agriculture.

4. Membership

The *Act* and Bylaws currently allow for five categories of membership: Professional Agrologist (P.Ag), Articling Agrologist (A.Ag), Professional Agrologist (Retired), Non-Practicing Status (Parental, Educational, & Medical Leave / Agrologist On Leave), and Student. The *Act* grants members *right to title*, meaning only members of the association can use the professional title associated with their membership category, but it does not grant *right to practice*. Therefore, the *Act* does not prohibit a person from working as an agrologist in BC if they are not a member of the Institute, and as such they would not be subject to the professional and ethical standards of the Institute.

Only those with Professional Agrologist status have full rights and privileges as members of the Institute, including the use of a seal and the right to the accompanying title and designation. The remaining four status categories are unable to use a seal or the title of Professional Agrologist, but may use the title and designation associated with their membership category. Articling Agrologists have full rights and privileges as members of the Institute without the use of a seal and must attend professional development activities during their articling term. The Professional Agrologist (Retired) status is for those members that have 'retired' from their work in agrology (i.e. they are no longer practicing agrology of any kind, paid or volunteer) but still want to hold membership to stay active in the organization. Retired agrologists have the right to vote and to hold office, receive information circulated to the membership from the Institute, to attend Institute events, and may use the title "Professional Agrologist (Retired)" and its associated designation, however, they cannot practice agrology. Non-Practicing membership are for those members which have stepped away temporarily from working in agrology, for example, in cases of parental leave, illness, or extended travel. Non-practicing members have the right to receive information circulated to the membership from the Institute and to attend Institute events but cannot practice agrology in any capacity or use the associated titles or designations. Members may take up to five years leave from membership without experiencing reinstatement penalties. Following the five year period, returning members must submit a new application for membership. Reapplications for re-registration generally go through the office rather than being re-processed by the credentials committee. The final membership category, Student members, have the right to receive information circulated to the membership from the Institute and to attend Institute events but are unable to vote and do not have the use of a seal or any title or designation. Annual submission of a declaration of student enrolment in a recognized post-secondary institution is required to maintain student status.

4.1. Enrollment Standards for Professional Membership & License

The *Act* grants council the authority to establish requirements and procedures for the admission or reinstatement of members. The Institute has established a standing Credentials Committee, which is responsible for ensuring that new members admitted to the Institute meet qualification requirements and overseeing the Articling Agrologist program. According to the terms of reference available on the BCIA website, the responsibilities of the Credentials Committee are to:

- Maintain awareness of trends in educational programs and areas of expertise in which Members of BCIA may practice;

- Within a reasonable period of time review applications using the then current qualification requirements to determine if applicants should be accepted as a Member of BCIA and placed into the Articling Agrologist program;
- Provide rationale or recommendations to applicants who do not meet the qualification requirements; and,
- Remain flexible regarding current areas of expertise and when necessary recommend to BCIA Council (“Council”) amendments to the Articling Agrologist program.

The Credentials Committee consists of at least three and no more than ten members, one of which must be a BCIA Council member. BCIA seeks volunteers to sit on the Committee through call outs for expressions of interest to its membership. BCIA council appoints the Credential Committee members, in consultation with the Nominations Committee. The Credentials Committee members recommend to the BCIA Council a Chairperson by majority vote of its members.

The Bylaws enable the Credentials Committee to set requirements for member admissions, and the Credentials Committee is responsible for administering admissions. The Institute has implemented the Articling Agrologist program, which includes a mandatory ethics course to evaluate applicants. Applicants may apply to full membership within the Institute either through their membership to Articling Agrologist program or as a transfer in from another jurisdiction.

The Institute states that application requirements include a completed application form, academic worksheet, official sealed transcripts, International Credential Evaluation Service review if applicable, resume, application fee and annual dues. As of January 2018, BCIA has updated its membership criteria to more closely align with the proposed National Entrance Standard (as supported by Agrologists/Agronome Canada). Membership requirements continue to rely on a combination of education and experience, with the new criteria increasing the number of courses required and applying more specific requirements regarding the number, level, and subject matter of requisite courses.

On average, the Institute reports that about 9% of applicants under the previous membership criteria were denied membership. The new requirements for membership have not been in effect for long enough to gather information on its effects. Applicants who are denied membership will often receive information from the Institute on which information or courses are required to successfully meet entrance requirements in the future. Typically the Institute will offer an extended articling period, rather than declining a membership application entirely, with the applicant fulfilling the requirements during their articling period.

4.1.1 Articling Agrologist Program

The Articling Agrologist program is a part of the admissions process where new members accepted for membership, who have not previously met the Institution’s requirements for designation as a Professional Agrologist and are not transferring from another province, are required to complete an education program and gain employed experience in the practice of agrology for an equivalent of two years prior to achieving their Professional Agrologist status. BCIA indicated that the program provides an introduction into the Institute and is intended to encourage active membership and participation in both branch and provincial affairs.

During the Articling Agrologist Program the member is required to take part in a number of events and activities and complete the following milestones prior to achieving Professional Agrologist status. These include but are not limited to attendance at BCIA Annual General Meetings, professional development events, Articling Agrologist workshops, ethics workshop and meeting with their mentor.

Applicants with over six years continuous work experience in agrology after university graduation, including at least two years within Canada, may request a reduction of the Articling term from two years to one. The Institute stated that it is the expectation that the Articling Agrologist will complete the articling program within three years, although this is not a requirement of the *Act* or Bylaws. There are no requirements for a member to become a Professional Agrologist once granted Articling Agrologist membership; however, after three years as an Articling Agrologist members must start paying dues at the rate of a Professional Agrologist.

4.1.2 Trade, Labour and Investment Mobility Agreement

In accordance with the Trade, Labour and Investment Mobility Agreement (TILMA), BCIA indicated that members in good standing with another Canadian agrologist's institution may have their membership transferred. Members may have dual membership in both BC and their home province. International applicants in good standing with their local agrologist's institution are assessed on a case-by-case basis. All initial applications go through the credentials committee, including transfers.

Every province has a slightly different definition of Agrology which the Institute indicated introduces some challenges in recognizing equivalent practices. Other provincial associations have specific Agrology Technicians or similar designations, but BC is unable to accept members of another Institute carrying these designations at this time as the institution does not recognize an equivalent designation.

4.2 Continuing Professional Development and Training

The Institute's Bylaws state that in addition to the requirements of the *Act* and Bylaws, Agrologists and articling Agrologists shall be subject to the continuing professional development guidelines and policies. The Professional Development Guidelines require that members meet continuing professional development (CPD) requirements to maintain membership. CPD is self-reported in the member's online profile, with 125 professional development hours required over a period of 3 years, excluding retired and student members. BCIA recommends that members maintain at least 30 hours per year, but this is not a mandatory requirement so long as members reach the 125 hour total for each three year period. The Professional Development Guidelines do not include CPD requirements for non-practicing members, but under the definitions of membership status, non-practicing members must report the professional development hours at the recommended minimum annually, along with the associated annual fee. To encourage and ensure that members are recording their CPD requirements, members must report their CPD activities online through the Professional Development Report (PD report) annually, prior to being allowed to renew their membership. This report allows members to record activities as they occur or submit on a yearly basis prior to payment of dues. The Institute stated that the PD report will also form the basis for BCIA audit program.

Professional Development can be reported under the following four categories: professional practice, continuing education, professional contributions, and professional service. A minimum of 10

professional development hours per year and a minimum of 50 professional development hours over the three-year period are recommended (although not mandatory) in the Continuing Education category. A maximum of 15 professional development hours may be claimed annually for self-study within the Continuing Education category. The Institute states that members are encouraged to choose professional development activities that maintain, improve and expand their skills and knowledge, and that are relevant to their scope of practice or support the development of a new area of expertise. Members are further encouraged to be active in at least two categories in addition to Professional Practice, but may not declare more than three areas of expertise annually. There are 38 recognized areas of practice which include agricultural, environmental, life sciences, and food categories.

4.3 Continuing Professional Development Audits

BCIA has a Professional Practice Committee whose mandate is to ensure members have the competence and expertise to serve the profession and protect the public. The Committee develops professional guidelines and policies, develops peer review and practice review audit procedures, develops standards of competence and expertise for specialized areas of practice, and reviews and updates the Institute's Code of Practice and Standards of Professional Conduct. The Professional Practice Committee consists of a minimum of 3 and no more than 10 members. At least one member must be a member of Council. BCIA members are able to self-nominate to the Committee. The BCIA Council will appoint the members to the Professional Practice Committee in consultation with the Nominations Committee.

In 2010, the Institute implemented a Professional Review Audit Program to help assess the professional development activities of its members as mandated by the *Act*. The Institute stated that the audits are completed annually and are randomly selected based on registration number, and they target an audit rate of approximately 5% of membership annually.

Members must provide the auditor adequate substantiation of professional development activities that have been included in annual declarations. Activities must meet the required number of hours, annually and over the past 3 year period and the total of continuing education professional development hours must also meet the minimum requirements. Declared hours must be relevant to the member's declared areas of expertise and competency or support the development of a new area of expertise. If the audit requirements are not met the institution indicated that the audit committee will identify the inadequacies and suggest actions to bring the member back into compliance with CPD requirements within a specified period of time.

Members who do not meet the minimum requirements may be requested to complete and submit a professional development plan outlining actions and a timeline to correct determined deficiencies.

5 Protecting the Public Interest

Government and the public share an expectation that a key role of regulatory bodies such as BCIA is to ensure the competency and integrity of professionals, in order to protect the public interest.

The purpose of the Institute as stated in the *Act* is to uphold the public interest by: preserving and protecting the scientific methods and principles that are the foundation of the agricultural and natural

sciences; upholding the principles of stewardship that are the foundation of agrology, and; ensuring the integrity, objectivity, and expertise of its members. The *Act* and Bylaws do not explicitly define the public interest.

In a submission provided as a part of this audit, the association stated that BCIA protects the public interest through accreditation of members, supporting ethical behaviour of members, ongoing professional development of members, and by governing members through its Bylaws.

6 Code of Ethics

The Code of Ethics is established as Schedule B of the Bylaws, and is therefore enforceable. The Code of Ethics states that agrologists have responsibilities to the general public, to their clients and employers, to courts and tribunals, and to the profession. It requires that “all members must exercise integrity, competence and objectivity in their professional conduct at all times, while fulfilling their professional responsibilities.”

BCIA offers an Ethics for Professionals Workshop, which the association indicated is a requirement of the Articling Agrologist Program. The full day workshop includes numerous case studies, as well as small group and plenary sessions. All professional agrologists are required to complete approved training in ethics, and a free refresher course on ethics is regularly offered and available. The Institute does not limit ethics training to courses they administer however, courses must be approved by BCIA to ensure appropriate coverage and training standards are met.

BCIA has a Code of Ethics Guideline that elaborates upon and clarifies the Code of Ethics and supports members in understanding of the nature of the professional obligations that arise from the Code of Ethics within the Bylaws. The Guideline reiterates that it is incumbent upon members to recognize that they must not allow their professional judgement to be compromised in any way by bias, conflict of interest or the undue influence of others. The Guideline outlines that members must bring objectivity and sound professional judgement to bear in providing their professional services at all times. According to the Code of Ethics, members must report to the Registrar where they have reasonable grounds to believe that another member may have engaged in professional misconduct or unprofessional conduct and mustn't engage in dishonorable or questionable conduct, in professional practice or private life, which casts doubt on the agrologist's professional integrity.

6.1 Conflicts of Interest

Conflicts of interest are situations in which the actions, aims, or goals of parties seem incompatible. The *Act* does not explicitly mention conflicts of interest, instead enabling the council to make Bylaws establishing standards of professional and ethical conduct, including a code of ethics. Bylaw 106 stipulates that all officers and members must comply with the Institute's conflict of interest guidelines. The Institute has not established stand-alone conflict of interest guidelines, but the Code of Ethics states that in discharging their responsibilities to the client and the employer, members must not use confidential information for their benefit, and must decline any employment which would give rise to a conflict of interest, must disclose an actual or apprehended conflict of interest, and must not accept

remuneration or compensation from more than one client or employer for the same work without the consent of all affected clients and employers.

Any member who fails to disclose a conflict to their client or employer would be subject to a disciplinary review according to the Institute. The Bylaws require that officers and members comply with the Institute's conflict of interest guideline.

6.2 Employer and Proponent Relationships

The *Act* and Bylaws do not explicitly address transparency in financial or employment relationships. While members are required to report professional misconduct on the part of other members, members are not required to report when their professional advice or expert opinion is not accepted by an employer or client. During the audit interview the Institute had no suggestions or comments on 'expert shopping' - the practice of employers hiring experts preferentially based on a preferred outcome - as they view it as the employer's right to determine who they employ. The Institute commented that some professionals may have more experience and success in particular areas and are more likely to be engaged in those areas.

6.3 Professional Conduct

The Institute's Code of Ethics sets the expectations for member conduct, stating that members must exercise integrity, competence and objectivity while fulfilling the professional responsibilities set out in the Code of Ethics as a whole. Consequences of contravening the code are laid out in the *Act*, and include reprimands, monetary penalties up to \$10,000, and restrictions on or suspension of membership.

7. Complaints and Discipline

BCIA has a Conduct Review Committee that is established in accordance with s.10 of the *Act* and Section 90(b) of the Bylaws. The mandate of the Conduct Review Committee is to adjudicate complaints regarding BCIA members that are submitted to the Committee following the complaints procedures. BCIA stated that the Chair of the Committee appoints 3 person panels from the committee members to determine complaints that are referred to the Committee by the Registrar. The respective Panel requires all three appointed members to participate to constitute quorum and make decisions based on a simple majority.

The Conduct Review Committee consists of a minimum of 3 and an average of 12 members, however, there is no maximum number set. The Institute indicated that the Committee allows for and may at times require ad hoc additions to the Committee to address issues or perceptions of bias or conflict of interest or to seek expertise. BCIA members are able to self-nominate to the Committee, though no member of the Conduct Review Committee may be a member of Council. The BCIA Council will appoint members to the Conduct Review Committee in consultation with the Nominations Committee. The Institute stated that although BCIA members make up the Conduct Review Committee, specific complaints can be investigated by paid contractors (this recently happened when a member of the Law Society of BC was employed to provide legal advice during the complaint and disciplinary process). The appointment of lay members to the Conduct Review Committees is not required.

The term for membership on the Committee is two years with members serving no more than a maximum of five consecutive terms for a total of ten years, although this period can be extended beyond 10 years by a specific motion of Council such as when a Committee member is involved in an ongoing complaint file. Appointments of Committee membership is staggered to ensure overlap of newly appointed and existing and returning members.

Historically, in order for a complaint from the public or from within the membership to be officially put forward, a written complaint must have been submitted to the Registrar. The Institute stated that, as of January 2018, the Committee has the additional authority to instigate an investigation of a matter on its own initiative.

When the Registrar of the Institute receives a complaint in writing, the Institute indicates that they follow a specified procedure to address the complaint. The Registrar first confirms that the subject of the complaint is a current or former member of the Institute, and assesses whether the subject matter of the complaint falls within the jurisdiction of the Conduct Review Committee to investigate. The Institute stated that the Committee does not have jurisdiction to address civil claims or criminal conduct, although the conduct could give rise to judicial and regulatory proceedings outside the jurisdiction and regulation of the Institute. Once the registrar determines that the complaint is against a member or former member and is within the Institute's jurisdiction, the Registrar assesses whether the complaint raises allegations that are trivial, frivolous, vexatious, or made in bad faith or otherwise warrant a summary dismissal without referral for investigation. If the complaint falls within the Institute's jurisdiction and is not summarily dismissed, the Registrar must provide a copy of the complaint to the respondent and request a written response within seven business days of the receipt of complaint by the respondent. The opportunity to provide a written response enables the member to provide the relevant facts and any other information which the member believes should be considered by the Conduct Review Committee for the purposes of the investigation.

After receiving the response from the member, the Registrar may, with consent from all parties involved, appoint or approve a mediator to attempt to resolve the complaint. If one or more parties do not consent to mediation or mediation is unsuccessful, the Registrar must refer the complaint to the Conduct Review Committee which may direct an investigation. The Registrar or another investigator can be directed to conduct the investigation and may require production of documents, records and other information from the member who is the subject of the complaint.

Once the investigation is complete, the Registrar will provide a copy of the investigation report to the complainant and the member, who will then have at least 21 business days to provide a written response to the investigation report. The Registrar must forward the investigation report, the complaint, the response to the complaint from the member, and the written responses to the investigation report to the Conduct Review Committee for a disposition decision.

After considering the materials provided, the Conduct Review Committee may:

- (a) determine that no further action is required;

- (b) authorize a practice review under Section 19(1) of the Act to be conducted in accordance with section 116 and section 117 of these Bylaws;
- (c) issue a written notice under Section 21(1)(c) of the Act requiring the Respondent to appear before it;
- (d) facilitate a consent order pursuant to section 119;
- (e) stipulate standards or expectations to be met by the Member ;
- (f) provide a caution to the Member based on provisional assessments;
- (g) issue an order for a financial penalty or the costs of the investigation incurred by the Institute (including the value of staff time spent on the investigation) as against either the Complainant if the Complainant is a Member or the Respondent in an amount not to exceed \$10,000 for a professional Agrologist or \$2,000 for an articling Agrologist;
- (h) direct the issuance of a citation ordering a discipline hearing under Section 24 of the Act;
- (i) take such other remedial action as it considers appropriate.

If the Conduct Review Committee issues a citation for a hearing the matter is transferred to the Discipline Hearing Committee. A 3 person panel of that Committee then conducts a hearing in accordance with Sections 127-136 of the Institutes' Bylaws and Sections 24-29 of the Act. The hearings of this Committee are conducted in public subject to privacy restrictions. Any decision of a Discipline Hearing Panel can be appealed directly to the Council with further appeals to the Supreme Court of British Columbia and the BC Court of Appeal available under the Act.

The association indicated that the nature of a complaint determines the weight or balance of the conduct in relation to public interests.

In compliance with all legislation protecting personal information, BCIA stated that the association can publically publish information about specific complaints after all avenues of appeal have been exhausted. Upon receiving a report of complaint, the Registrar must comply with privacy legislation, and the Institute states that the registrar may redact any portion of a report or complaint in order to protect members from negative repercussions. At the time of this audit there are not publically published complaints on the associations' website.

8. Liability and Negligence

Professional liability refers to the legal responsibility of a professional to be held accountable for the outcomes of his or her professional work, specifically any errors and omissions. Professional negligence is where a professional fails to provide duty of care to their client, meaning that harm to people or property has occurred as a result of improper advice and precautions by the professional. The expected standard for professional practice is defined as what another reasonable person in that profession would do.

BCIA members are expected to subscribe to the concept of due diligence and rely on the outputs of other professionals to formulate opinions. If members state a professional opinion or make a

recommendation they must be prepared to present supporting evidence to back up the opinion or recommendation when challenged.

8.1. Liability Insurance

BCIA recommends Errors and Omissions insurance to be obtained by members but it is not a mandatory requirement of its members. BCIA has organized Errors and Omissions insurance through the carrier of HUB International. Approximately 50 members carry this insurance through HUB International.

BCIA maintains that whether or not an Agrologist includes their P.Ag designation on a report or correspondence, they are still held accountable for their actions as a member of BCIA. Therefore, not using the seal or professional designation is not a way to avoid accountability to the Institute or to the public.

8.2. Assurance Statements and Certifications

The Institute noted that Assurance Statements are not commonly used in the field of agrology. Consequently, BCIA has not adopted, nor does it currently mandate its members to utilize assurance statements.

Only members with the Professional Agrologist designation may receive and use a seal along with the designation P.Ag. The seal indicates personal professional assurance that the stamped document contains information presented and assessed to the standard of a Professional Agrologist. The seal can be applied to publications, monographs, reports, special letters, plans and drawings representing projects a P.Ag. has worked on, or for which the P.Ag. is directly responsible. The Institute has published guidance on their website to support members in using their professional seal.

9. Scope of Practice

BCIA is a *right to title* institution, as discussed under Section 4 above (Membership). The *Act* defines agrology, but does not define or protect the practice of agrology, and therefore the Institute cannot restrict or limit practice to members nor manage individuals practicing agrology who are not claiming titles restricted to members. Therefore, there may be individuals who practice agrology in BC who are not subject to the regulations, requirements, and obligations of BCIA.

The Institute requires members declare area of practice as a part of membership renewal, and reporting professional development is considered mandatory. The association's website also allows clients to search for members according to their declared area of practice, and CPD is required and audited with regards to these declared areas of practice.

The Institute raised the issue of right to practice in the audit interview, and requested that the review of professional reliance include analysis of right to practice relating to the practice of agrology.

10. Discussion and Conclusions

This limited scope audit is one part of a broader review of professional reliance. Specifically this audit considered whether BCIA is fulfilling the legal obligations addressed in this report as the body that

regulates professional agrologists in BC. This audit found that the association is in compliance with the mandatory requirements of the *Act* that are addressed in this report.

It should be noted that at the time of the audit interview, the association was in the process of finalizing new Bylaw amendments that became effective on January 1st, 2018. As the amendments are recent, this report does not speculate on the long term effects of these changes.

The association indicated that they feel the current processes for enrollment, articling and continuing membership are working well. The association has created a Code of Ethics, and supports this bylaw with published Guidelines for Interpretation and mandatory ethics education for member applicants. The association expressed no concerns with the current conduct review process.

BCIA stated that they commenced a review in 2018 of the existing technician designations in other provinces and will consider future changes to the Bylaws to allow for some form of technician designation within BC. In addition, the Institute is reviewing its qualification criteria to establish some form of recognition of traditional indigenous knowledge as qualifying toward agrologist status.

In the interview and materials provided as a part of this audit, the association requested that *right to practice* be analyzed as part of the larger Professional Reliance Review. Specifically, the association is concerned about their inability to regulate people working in agrology who are not members of BCIA and therefore are not subject to the *Act* or Bylaws of the association. The association emphasized that this would have to be carefully considered, especially with regards to groups that have historically practiced agrology without professional designations. With the broad range of allowable Areas of Practice within the definition of Agrology, defining the scope of right to practice would need to be carefully considered.

This limited scope audit is one part of a broader review of professional reliance.