

CSA SECRETARIAT
Canadian Securities Administrators
Tour de la Bourse
800, Square Victoria
Suite 2510
Montreal, QC H4Z 1J2

June 29, 2010

Dear Sir/Madam,

RE: REVISIONS TO NATIONAL INSTRUMENT 43-101.

I am providing feedback on behalf of the Association of Professional Engineers & Geoscientists of Manitoba (APEGM) on the *Proposed Repeal and Replacement of National Instrument 43-101 Standards of Disclosure for Mineral Projects.* Please consider the following comments:

## Qualified Person (QP) for 43-101 Reporting and Disclosure

It is the position of APEGM that any QP acting for an issuer in Canada should be a licensed professional in a Canadian jurisdiction. More specifically, there should be legal requirements that a QP evaluating a property in Canada must be registered in the jurisdiction in which that property is located.

## Definition of Professional Association

Please remove subsection (d) in the definition of "professional association." The APEGM does not have legal authority to apply "...disciplinary powers, including the power to suspend or expel a member regardless of where the member practices or resides." Such authority only exists over members practicing within the geographic limits of the province of Manitoba.

## Definition of Qualified Person

The APEGM supports the changes to the definition of "qualified person" as proposed.

Thank you for the opportunity to provide our input.

Yours truly,

Grant Koropatnick, P. Eng.

Executive Director & Registrar

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c. Manitoba Securities Commission