CITATION IN THE MATTER OF THE COLLEGE OF APPLIED BIOLOGY OF BC

and

Shawna Reed, R.P.Bio. #1133

TO: Shawna Reed, R.P.Bio

TAKE NOTICE that, on a date and location to be determined, a Discipline Panel of the College of Applied Biology of the Province of British Columbia will be convened to undertake a hearing for the purpose of taking evidence and deliberating with respect to allegations described herein, pursuant to the *College of Applied Biology Act*, S.B.C. 2002, chapter 68.

AND TAKE NOTICE that the following allegations are made against you:

- 1. That you are in breach of paragraph 3 of Schedule 2 (The College of Applied Biology Member Code of Ethics) of the Rules of the College of Applied Biology by virtue of the fact that, in the preparation of a Construction Environmental Management Plan (Project No. 12542-001), dated April 2018, and related work, you failed to meet the appropriate professional standard of care in relation to:
 - (a) sediment and erosion monitoring techniques;
 - (b) the use of an unusual method (mud wave) technique for excluding aquatic organisms;
 - (c) the standards for reports and data management for environmental monitoring; and
 - (d) the application of the correct Contaminated Sites Regulation standard.

AND FURTHER TAKE NOTICE that you, Shawna Reed, R.P.Bio., have the right, at your own expense, to be represented by counsel at the hearing by the Discipline Panel and that you or your counsel shall have the full right to cross-examine all witnesses called and to call evidence in defence and reply in answer to the aforesaid allegations.

AND TAKE FURTHER NOTICE that in the event of your non-attendance at the hearing, the Discipline Panel may, upon proof of service of the Notice of Hearing upon you, proceed with the taking of evidence or otherwise ascertaining the facts concerning the said allegations, your absence notwithstanding, and may make its findings on the facts and its decision thereof without further notice to you.

DATED at the City of Victoria, in the Province of British Columbia, this 26 day of October, 2020.

The Discipline Committee of the College of Applied Biology of the Province of British Columbia

Welf of

Per:

Mel Kotyk, R.P.Bio. (Ret), Chair