Minutes

Complaints Task Group, Meeting #6

Date: April 16, 2014
Time: 9am – 3:30pm
Place: CASA office, Edmonton

In attendance:

Name	Stakeholder group
Ann Baran	Southern Alberta Group for the Environment
Mike Bisaga	Lakeland Industrial Community Association
Roxane Bretzlaff	Canadian Association of Petroleum Producers (Canadian Natural Resources Limited)
Keith Denman	Alberta Environment and Sustainable Resource Development
Jennifer Fowler	West Fraser - Hinton Pulp
Joseph Hnatiuk	Canadian Society of Environmental Biologists
Carolyn Kolebaba	Alberta Association of Municipal Districts and Counties
Jim Lapp	City of Edmonton, Compost Operations
Tanya Moskal-Hébert	Alberta Agriculture and Rural Development
Ludmilla Rodriguez	Alberta Health Services
Merry Turtiak	Alberta Health
Dalene Wilkins	Alberta Energy Regulator
Celeste Dempster	CASA

Action Items:

Action Items	Who	Due
5.1: Ludmilla will inquire if Health Link Alberta protocol scripts can be shared.	Ludmilla	Meeting #6.
6.1: Dalene will share the wording from Directive 60 that relates to tracking complaints.	Dalene	Meeting #7
6.2: Celeste will type up the small group analysis summaries of Questions 2-12.	Celeste	ASAP

1. Administrative Items

Tanya chaired the meeting which began at 9:00am. Participants introduced themselves and were welcomed to the meeting. Quorum was achieved.

The agenda and meeting objectives were approved.

The minutes from meeting #5 were reviewed and approved with the following edits: several typos were noted and on pg. 2 'municipal representatives' was corrected to read 'municipal approval staff'. The action items from meeting #5:

Action Items	Who	Status

3.3: Merry and Joseph will check if the federal government (specifically Transport Canada) does anything with respect to odour.	Merry, Joseph	Complete.
5.1: Ludmilla will inquire if Health Link Alberta protocol scripts can be shared.	Ludmilla	Carry forward.
5.2: Keith will follow-up with Michael about what sort of tools and recommendations would be helpful for ESRD compliance officers.	Keith	Complete.
5.3: Celeste will share the presentations from complaint handling agencies from meeting #5.	Celeste	Complete.
5.4: Celeste will share Christine King's presentation.	Celeste	Complete.
5.5: Each presenter will review their material in the draft background report for accuracy.	All presenters	Complete.
5.6: Celeste will communicate the desired changes to the draft background report to Scott.	Celeste	Complete.
5.7: Celeste will poll for dates for meeting #6 in April.	Celeste	Complete.
5.8: Celeste will poll for dates for meeting #7 in May.	Celeste	Complete.
5.9: Celeste will poll for dates for meeting #8 in June.	Celeste	Complete.

Additional Information:
Action Item 3.3: The federal government is not involved in odour management.
Action Item 5.2: ESRD compliance officers were involved in the development of the CIC ESRD form and the task group can use this as a guide. Keith may be able to provide additional information at a subsequent meeting.

2. CASA Update

Celeste provided an update on the Odour Management Team:
- The team will meet next on April 30th where they will continue their discussion about how to action the remaining areas of work in the Project Charter. The team plans to form two additional task groups. The team anticipates that all task group work will be completed by the end of 2014.
- The team will be providing an update presentation on team and task group activities at the CASA Board meeting on June 5th.

Celeste also provided an update on the work of the Odour Assessment and Health Task Groups:
Odour Assessment Task Group:
- The task group had a kick-off meeting with the successful consultants who will be conducting an inventory and analysis of odour assessment tools/practices and their applicability to the Alberta context. This work is expected to be complete in September.

Health Task Group:
- The task group is focused on two pieces of work:
  - Stream 1 - A backgrounder about odour and health:
    - The task group has prepared a table of contents and is currently drafting the backgrounder.
  - Stream 2 - Tool(s) for individuals to track the health-related impacts of odour
    - The task group has begun designing this tool.
- The task group plans to meet in early June where they will review the backgrounder and continue designing the tool.

Celeste provided an update on other CASA initiatives:
- The next CASA Board meeting will be June 5th in Calgary. The CASA 20th year celebration will take place on June 6th in Calgary.

The group discussed the AER panel's *Report on Recommendations on Odour and Emissions in the Peace River Area*. It was noted that the recommendations are being embraced by implementers. It was also noted that ESRD is considering how to implement the recommendation "ESRD assess the feasibility of defining an ambient odour objective for Alberta based on a perception threshold" and the work of the Odour Assessment Task Group may be able to provide useful information to inform this discussion.

3. Develop Analysis Criteria

The task group developed the following criteria to analyze the responses to the questions in the Background Report:
- Common themes
- Unique approaches

4. Review Responses to Questions in Background Report

The task group then broke into small groups to analyze Questions 2-12 from the Background Report. Question 1 was not included in the analysis since it looks at the number of complaints received only. Summaries of these discussions can be found in Appendix 1.

Action Item 6.1: Dalene will share the wording from Directive 60 that relates to tracking complaints.

Action Item 6.2: Celeste will type up the small group analysis summaries of Questions 2-12.

The task group noted that they would like to have a discussion about managing frequent callers.

5. Strengths and Gaps Discussions

Each small group was then responsible for an initial brainstorm about the strengths and gaps of the current odour complain landscape in Alberta for Questions 2-12 from the Background Report. For the purposes of the discussion, questions 11 and 12 were combined. The entire task group then had the opportunity to contribute additional ideas and ask clarifying questions. The purpose of this discussion was not to reach consensus, but to create a common understanding of all the strengths and gaps identified. Additional strengths and gaps could be identified in the future. A summary can be found in Appendix 2.

This discussion raised the question: When it comes to information collection, analysis and reporting what do we want the data to tell us? The task group noted that this will need to be considered during tool development.

6. Next Steps

The task group identified the following next steps:
- Group the strengths and gaps identified into common themes.
- Prioritize strengths and gaps where work will be focused.
- Discuss frequent callers.
- Discuss next steps.

The task group noted that Step 2 (Cross-jurisdictional review) from the task group's workplan will be used to help inform tool development around identified gaps by leveraging work done in/information available from other jurisdictions in a focused way.

7. Budget Check-in

There are no updates at this time.

8. Meeting Wrap-up

The team reviewed the action items from today's meeting.

The objectives for meeting #7 are outlined under item 6.

The meeting adjourned at 3:25pm.

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Appendix 1: Summary of small group analysis

Question	Common Themes	Unique Approaches
2: How do you receive complaints?	– Telephone-based mostly. Complaints may come by email, letter, and in-person – There are some centralized numbers but people may not be aware of them – There are referrals made according to type/jurisdiction to deal with odours – Major organizations take complaints and deal with them or refer them to the appropriate organization	– Coordination and Information Centre (CIC): Different 1-800 numbers for AESRD, AER and NRCB that connect to the CIC
3: Who has the initial contact with the complainant and what are their qualifications?	– For major organizations the call centres are staffed with people having formal training (both technical and people skills)	– Organizations like AESRD, AER, and NRCB have training to handle calls and use the CIC approach – Health Link Alberta and referrals to the 1-800 numbers
4: What information do you collect from the complainant?	– All organizations collect personal contact information (when callers are willing to provide it) – There is an attempt to obtain a description to categorize odours but the depth of information gathered differs from one agency to another	– CIC scripts – Health Link Alberta scripts – Some companies also have scripts
5: How do you determine the appropriate response to a complaint?	– Everyone answers the phone NB: How do you determine what is 'appropriate'?	– Each sector deals with the complaint differently
6: What tools are used to investigate complaints?	– Those groups that do investigate use tools	– The tools that are used vary from high-tech air monitoring equipment to noses – Each group has their own process for investigating
7: How do you	– There is some level of documentation	– Documentation varies from very simple (informal or no

document your process?		process) to complex – AER has a detailed documentation database that logs are information associated with the complaint
8: Do you track complaint data? If so, how.	– More than half collect the number of complaints – Many track complaints by time of day, season, date, etc. – Some include data in monthly reports – Most analyze data on a temporal basis – No follow-up once the complaint is closed – Most use electronic tracking but each uses their own system of tracking	– NRCB uses a paper copy of their form – NRCB analyzes data against weather conditions – At the EWMC, number of complaints triggers response – Transportation (Altex) has no formal tracking procedure
9: Does your process require that you share complaint information with other agencies/partners?	– FOIP is an issue for everyone – There is no formal process for everyone to share information (often voluntary) – Government relays callers to appropriate government agency	– Hinton Pulp and government have a media release protocol – Can purchase information from AER – AESRD has a trans boundary agreement with the federal government and links with those agencies if needed – AAC has a "release of name" in their documentation process – Public Health is very stringent with release of information – EWMC has a third party involved with investigating odour complaints
10: What are the timelines associated with your process?	– Most try to follow-up in a reasonable time – usually 24-48 hours – Most follow-up with complainants – Once complaint is closed, there is no follow-up – Investigations are prompt – Most are prompt responses to the phone calls	– AER triage system – Environmental Public Health can issue an urgent complaint which leads to immediate response – At the NRCB, the call is triaged to specific office for an area.
11: What lessons learned can you share about your process? &	– Timely quick response to the person who made complaint is essential – Streamlined response path with consistent information collected – Recognition that odour management can take time	– Proactive engagement with community (education/awareness approach) – Development of a matrix to guide investigation – this matrix would be informative to the regulatory body and receivers of complaints

	to resolve
	− Building community awareness about odour situations in the community and actions related to odour management
12: Do you have any tools/policies/forms related to your process that you can share?	− All have a form but the NRCB was unique as their form is specific to odour. This could support a rationale to have odour treated "specially" instead of generically. − Odour wheel – unique tool that helps communication between complainants to responder. Need to consider when it should be used.

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Appendix 2: Summary of strengths and gaps discussion

Question	Strengths Identified	Gaps Identified
2: How do you receive complaints?	A. The 1-800 numbers are useful when they are used B. Calling the source (ex. a specific facility) can be an effective was to resolve an issue C. People feel heard when they speak to a real person	a. Awareness: people don't know who to call b. Phones are not accessible for people with hearing loss c. Wrong initial contact can lead to callers being 'bounced around' d. Internet-based systems for reporting complaints e. Many industry, municipalities do not have a system in place to manage odour complaints
3: Who has the initial contact with the complainant and what are their qualifications?	D. The 1-800 numbers are dealing appropriately with phone calls referencing odour complaints E. The 1-800 number operators have training	f. Non-1-800 number operators may not receive the same level of training as 1-800 number operators g. Inconsistencies in training: operators require both technical and people skills h. Callers being 'bounced around' i. 1-800 numbers are not area or industry specific j. Using regional knowledge to address an issue, put it into context, and communicate with the local population appropriately (including cultural diversity).

4: What information do you collect from the complainant?	F. Existing forms for collecting information (ex. NRCB, AER, ESRD)	k. Communication between non-experts on a complicated topic like odour is challenging
		   o Person taking a call may not be an expert
		   o The person calling is not an expert
		l. Inconsistencies between information collection forms
		m. Odour descriptors: There is a large variation in types of odours (that are often activity specific and odour descriptors are not clearly defined (i.e. people don't know how to describe odour)
		n. Information that may affect an odour complaint (ex. Wind, weather) is not always/consistently gathered from caller
		o. Following up on anonymous complaints: may potentially

		have incomplete information that prevents follow-up (ex. no location)
5: How do you determine the appropriate response to a complaint?	G. All sectors are passionate about fixing the problem H. AER process	p. Ability to fix the problem specific to the complaint q. Tools available/used can change based on regulation and jurisdiction r. Source may not be known which makes follow-up challenging s. Timely follow-up is crucial t. Resources (staff) may not be immediately available in the area u. Population density concept not built into response v. Identifying when a response is complete and defining the 'out'
	I. Communication process between ESRD and the City of Edmonton as well as the process between AER and industry.	w. Delay in communication of complaint to industry so they can respond in a timely manner (24-48 hours is usually too long because the odour may no longer be present) x. Ecosystem considerations (ex. Wildlife)
6: What tools are used to investigate complaints?	J. There are various tools used K. There is a desire to create new tools L. CIC scripts	y. Lack of consistency across tools z. Lack of common language to talk about odour (so that government and industry are talking about odour the same way) aa. Regulation and enforcement tools
	M. New technology	bb. Regulators need to keep up with new technology cc. Understanding the current status of a region – impacts what is/is not acceptable dd. Best available technology vs best 'economical available technology for monitoring and odour abatement (a technology may be available but too expensive to feasibly install) ee. Odour training for investigators from government and industry
	N. People feel satisfied that any monitoring is being done	ff. Some investigation equipment is emissions rather than odour-based gg. Subjectivity of odour hh. AAQOs (no exceedance, but odours still being reported)

7: How do you document your process?	O. Everyone does capture information
	P. NRCB process
		ii. Lack of standardization of information collected
		    o So data can talk to each other
		jj. Lack of tracking/trending of data
		kk. Sharing information locally so can get an idea of the big picture
		ll. Lack of timely enforcement
		mm. Public reporting of information
		nn. Follow-up with complainant inconsistent or not timely
		oo. No performance measures to indicate whether the process is working/not working
		    o Audit of records by third party

8: Do you track complaint data? If so, how.	Q. Data collection is occurring by date/time, electronically R. Data is analyzed by season and time of day/activity S. Some approval conditions require tracking and reporting data annually T. AER directive 60 requires industry to documents complaints and make available upon request	pp. Only temporal data is tracked/analyzed, collection is needed on weather and odour descriptors qq. No follow-up on closed files rr. Some industries do not track complaint data ss. Consistency on how many complaints trigger a response tt. Cumulative effects uu. Regional differences vv. How to deal with multi-source ww. If information is being tracked, standardizing for trending and evaluation xx. Not all odour sources are required to report complaints
9: Does your process require that you share complaint information with other agencies/partners?	U. Awareness of FOIP and Health Information Act (HIA) V. Government (CIC) triage process to share information with other agencies W. Government transboundary communication (provincial to federal – single window), (province to province?) X. Third party monitoring/complaint investigation (adds credibility) Ex. WCAS monitoring station for Hinton Pulp Ex. Third party odour surveys for EWMC	yy. No formal information sharing process zz. Information access is inconsistent aaa. Clear FOIP/HIA practices that allow sharing between groups bbb. What is the follow-up after the government hands off a complaint to another group? NB: How are media requests handled? Is this a gap?
10: What are the timelines	Y. Prompt follow-up (usually within 24-48 hours) as a result of a call	ccc. Government triage does not extend outside to others (non-government)

associated with your process?	Z. Government triage process AA. Public Health urgent response	ddd. Lack of distinction of difference in time scale between call (response to complaint) and final resolution of an issue (management of issue)
11: What lessons learned can you share about your process? & 12: Do you have any tools/policies/forms related to your process that you can share?	BB. Reactive Communication Plan by regulatory body or industry CC. Timely quick response DD. Odour mitigation (if possible) takes time and this is recognized	eee. Proactive Communication Plan for all stakeholders fff. Slow response ggg. It is not well communicated/accepted/understood by the public that odour mitigation (if possible) takes time hhh. Investigation/response matrix development iii. Education and response tools (i.e. form, odour wheel, source fact sheets) jjj. Incorporate density concept (i.e. local population) into response (urban, suburban, rural) kkk. Consistency on information collected about an odour complaint lll. Identifying triggers for areas of 'chronic' concern and appropriate tools/response/investigations for these mmm. Early contact can de-escalate emotions nnn. Proper referrals to avoid 'bouncing around' ooo. Communication between bureaucracy and politicians