



Minutes

Complaints Task Group, Meeting #14

Date: December 9th, 2014
Time: 9am – 3:30pm
Place: CASA office, Edmonton

In attendance:

Name	Stakeholder group
Jennifer Fowler	Hinton Pulp
Keith Denman	ESRD
Ann Baran	Southern Alberta Group for the Environment
Joseph Hnatiuk	Canadian Society of Environmental Biologists
Roxane Bretzlaff (by phone)	Canadian Natural Resources Ltd.
Tanya Moskal-Hébert	Alberta Agriculture and Rural Development
Lori Weltz	Yellow Dog Communications Ltd.
Dalene Meier (by phone)	Alberta Energy Regulator
Celeste Dempster	CASA
Michelle Riopel	CASA

Action Items:

Action Items	Who	Due
14.1 – Flag the issue of what to do if a caller seems to be impaired - for discussion with Ludmilla.	Celeste	Meeting #15
14.2 – Provide Celeste with the FOIP-related links.	Keith	ASAP
14.3 – Contact PIPA to ask if they think an explicit statement on use of information is needed, and suggested wording.	Keith	ASAP
14.4 – Provide the next draft of the Booklet content by January 22 nd .	Lori	January 22, 2015

1. Administrative Items

Jennifer 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 #13 were reviewed and approved with the correction of several typos. The action items from meeting #13 were reviewed as follows:

Action Items	Who	Status
8.1: At the appropriate time, members will review the protocols related to 'repeat callers'.	All	Carry forward.

12.5: Jim, Dalene, Jen and Keith will help to fill in the 'odour boxes' in the decision tree by answering: 1. What activities would produce those odours? 2. What province-wide number would you call in that case?	Jim, Dalene, Jen, Keith	Carry forward. Dalene & Jen complete. See additional information.
12.6: Ludmilla will send Celeste the names of the HealthLink Alberta participants for pilot testing.	Ludmilla	Carry forward.
13.1: Since quorum was not achieved, Celeste will follow-up with industry members.	Celeste	Industry members will have the opportunity to provide input under items 3 & 4.
13.2: Ann will identify information from the background report that relates to each of the topics identified under Investigation Response at meeting #13.	Ann	Complete.
13.3: Celeste will ask Ludmilla and Keith if they can provide some information on the legal implications of recording personal information (data collection section).	Celeste	Complete. See additional information.

Additional Information:

Action Item 12.5: Keith has spoken to Mike Aiton but received no response. He will follow-up for the next meeting.

Action Item 13.1: As the booklet and decision tree material is still in draft form, and industry would have the opportunity to provide feedback in meeting #14, it was agreed that this Action Item was unnecessary.

Action Item 13.3: The task group heard from Keith and are waiting to hear from Ludmilla. Keith shared the following:

- FOIP applies to information use by governments; PIPA applies to information use by other organizations.
- Collected information can only be used for the purpose for which it is gathered.
- Each organization needs to have a policy for how they will use collected information.

2. CASA Update

Celeste provided an update on the Odour Management Team:

- The OMT last met on December 2, 2014.
- The OMT is working on details to assemble and to roll-out the Good Practice Guide.
- The OMT will meet next on January 22, 2015.
- Funding: Alberta Agriculture and Rural Development has committed \$10,000 in new funding for OMT to help with printing and roll-out of the Good Practice Guide.

Celeste also provided an update on the work of the task groups:

Health Task Group:

- The task group is focused on two pieces of work:
 - Stream 1 - A backgrounder about odour and health:
 - The task group is currently working on the backgrounder.
 - Stream 2 - Tool(s) for individuals to track the health-related impacts of odour
 - The task group has developed a prototype and is conducting pilot testing to ensure clarity and ease of use.
- The task group is currently working on both streams of work and preparing their final report for the OMT. They expect to finalize their work in January.

Odour Assessment Task Group:

- The task group is working with a consultant to prepare an inventory and analysis of odour assessment tools. The report will contain a 2-page overview of each odour assessment tool (with links to more detailed resources), general guidance steps for choosing tools depending on the purpose of the odour assessment, and a matrix outlining the characteristics of each tool allowing users to easily compare tools.
- The task group is currently working with the consultant, and expect the report to be finalized by the end of the year.

Prevention/Mitigation:

- The task group is working with a consultant to prepare an inventory and analysis of odour prevention and mitigation tools. The consultant has provided a draft report for the group to review and provide feedback. The report is expected to be finalized in January, with task group work done by end of February.

Enforcement/Role of Regulation Task Group:

- The task group is working with a consultant to collate and review regulatory approaches. The consultant has provided a draft report for the group to review and provide feedback. The report is expected to be finalized in January, with task group work done by end of February.

Celeste provided an update on CASA activities:

- The Board met on December 4th, 2014 in Calgary, where the OMT gave an update presentation. The presentation indicated that the Odour project would be complete by June 30, 2015, with a presentation at the September 2015 Board meeting.
- The next Board meeting will be in March 2015.
- CASA held a training workshop in interest-based negotiation on November 27, 2014. The session was full. Anyone who would like to attend the next session (likely spring 2015) should contact Celeste.
- The Non-Point Source Project Charter was presented to the Board at the September Board meeting. The Board approved the Charter in principle, but agreed not to proceed with the project until funding could be approved. Industry and Government caucuses were given the action item to discuss funding and report back. This is pending.

3. Review Draft 'Booklet' Material – Data Collection

Celeste reviewed the vision developed at meeting #11 for the Data Collection part of the booklet. Lori used the content developed by the group for this section (see meeting #13 minutes - Appendix B) to create two draft documents: a narrative document, and a complaint form. The group was given the drafts to review and provided the following feedback.

In general, the group felt that the drafts were well-written and clear, and presented the right amount of information. They also appreciated the emphasis on the role of complaint taker to listen to the caller/complainant. There was a general discussion around how to handle calls from individuals who may be impaired due to the odour they are calling about, and the group agreed to delay this conversion until Ludmilla could participate to provide a health perspective.

Action item 14.1 – Celeste will flag the issue of what to do if a caller seems to be impaired for discussion with Ludmilla.

Narrative Document feedback:

- General
 - Lori will draft an overarching section for the booklet that includes the parts of today's feedback that she thinks fits in that section, based on her discretion.
 - Add paragraph from the decision tree regarding the need for each organization to customize the guidance document and complaint form.
 - Add the CIC phone number and 2-3 sentences on when to use it (i.e. as a backup in instances when callers are unhappy with the way a call is being handled).
 - The Health Link number should be included somewhere as a quick-reference.
- “Additional comments or information”
 - Add language to clarify that these are not questions to ask. The purpose of this section is to highlight the kind of information that might be useful to record if the complainant volunteers it without being asked.
 - In the last bullet replace “Desired result” with “Caller’s expectation”.
- “Communicating with callers”
 - Add language to clarify the importance of recording only information that is provided by the caller, and not to make assumptions or speculate (ex. deducing the weather in the area where the complainant is calling from). This is especially important to remember when complete information cannot be retrieved from the caller.
- “Sharing personal information”
 - Add discussion to indicate that each organization needs to have some sort of thought-through policy on their use of collected information, and that collected information can only be used for the purpose for which it was gathered. This section could inform a disclaimer script tailored to each organization that can be used when talking to complainants. Include links to the appropriate reference documents (i.e. FOIP for government use and PIPA for other organization use).
- “Ending the call”
 - Add discussion to indicate that each organization should consider who they might be passing information on to. Note: this relates to the section of the complaints form that asks permission to give a complainants’ contact information to another agency.
- “Action taken”
 - Add language to clarify that each organization should determine a method of tracking calls that is appropriate, so that call-takers have a way of quickly getting up to speed. This could include use of reference numbers, getting a phone number, etc.
- “Emergency or Health concerns”
 - Add a few sentences re: if someone indicates a health issue, the call taker should first ask for the complainant’s location, and then direct them to call 911. The call-taker should then notify CIC that there was a call of this nature, and the location it came from.

Action item 14.2 – Keith will provide Celeste with the FOIP-related links.

Acton item 14.3 – Keith will contact PIPA to ask if they think an explicit statement on use of information is needed, and suggested wording.

Complaint form feedback:

- Font is too small – may need to be more than one page.

- Add lines for notes on the follow-up call.
- Add “No answer” check-boxes to the form under each section.
- Intensity section
 - Consider alternate more accessible word for “pervasive”.

4. Review Draft ‘Booklet’ Material – Initial Response

The task group reviewed the vision they developed at meetings 11 and 12 for the Initial Response part of the booklet. Lori used the content developed by the group for this section (see meeting #13 minutes - Appendix C) to create a draft document. Lori noted that much of the content originally intended for this section has been moved into the Data Collection section. The group further discussed what advice/guidance they would like to provide on this topic, and gave the following feedback on the draft document:

- “Coordinating with local agencies/organizations”
 - May fit better in the overarching section.
- Add brief discussion of the need for organizations to develop a call-back policy. (i.e. What is the process for getting back to callers? What will the call-taker tell the caller to expect? How will this get incorporated into the process?)

As per action item 12.3, Keith provided a brief explanation of the initial response matrix table that he created based on an AER document. The purpose of this type of table is to allow call-takers to quickly determine how serious an issue is, what types of issues trigger which responses, next steps, and what to tell the caller about what will happen next. The group agreed that each organization will need to develop their own framework for initial response, but that it would be useful to include a brief discussion of things to consider when developing the framework and an example matrix similar to the one from Keith. Lori will draft this and add it to the document.

5. Develop Content for Booklet – Investigation Response

Using the extended Investigation Response table (action item 13.2), the task group reviewed information from the background report relating to this section, as well as the vision for this section and the topics they determined would be covered (as per Appendix A in the meeting #13 minutes). They discussed content for Lori to include in the draft of this section, as outlined in Appendix A of these minutes.

The task group discussed next steps as follows:

- Lori will redraft the content from data collection and initial response based on the group feedback.
- Lori will create a first draft of investigation response based on the group discussion.
- Lori will draft the overarching/ transition pieces based on the group discussion.
- The task group will receive the draft Booklet material for review one week prior to the next meeting.

If Lori has any questions she will contact the project manager. If the project manager is not able to respond, he/she will contact the co-chairs. If the co-chairs are not able to provide a response, the question will be put to the whole task group.

Action item 14.4 – Lori will provide the next draft of the Booklet content by January 22nd.

6. Workplan: Timelines and Budget

The task group noted that they are on budget and on schedule. The task group anticipates that their final report to the OMT will be ready by the end of February 2015.

The group agreed that a verbal update would be provided to the Odour Management Team at their next meeting on January 22, 2015.

7. Meeting Wrap-up

The task group reviewed the action items from today's meeting.

The next meeting will be held on January 29th, 2015 in Edmonton.

The objectives for meeting #15 are:

- Review draft 'Booklet' material from Lori and provide feedback at meeting #15.
- Hear results of the pilot testing and make changes to the decision tree as needed.
- Time allowing:
 - Discuss secondary areas of work, in particular 'repeat callers'.
 - Discuss table of contents for final report.

The meeting adjourned at 2:20 pm.

Minutes



Appendix A

<p style="text-align: center;"><i>Investigation Response:</i> is focused on good practices for investigating complaints. Person who receives that call is not necessarily investigating the complaint. You should have an investigation complaint process. Here are the elements that you should include and some considerations. Lay out high level principles/common ground, but not getting into details. Not writing a manual for field investigators.</p>		
<i>How</i>	<i>Content for 'Booklet'</i>	<i>Notes</i>
1. How frequently to update the complainant?	Comply with the process that you outlined in initial response and what you told the complainant you would do If you're working with another organization need to understand who will report back to/update the caller (related to #10)	Depends how long the investigation lasts. Should at least get a call back when investigation complete. May want to contact at key milestones in the investigation if it is particularly complex.
2. Safety concerns (ex. weather)	Examples: – Weather – Wildlife, livestock – Confrontational/dangerous people – Wildfires – Dangerous substances – Physical location If you're not able to do what you said you would because of safety concerns, follow-up with the complainant Don't put your investigator in danger May need to develop specific policies (ex. Working alone, confrontational people) Try to mitigate the risk	If hinders the investigation (ex. Blizzard), should let the complainant know that something has changed (ex. The investigator couldn't make it out). Provide some short guidance on considerations around this topic.

	If you can find an alternate way to investigate, do so	
3. How long to keep documentation?	Determine if you have any legal requirements and comply Does your organization have a records management policy? If not, you should have a policy Need to make sure that you're protecting personal information however records are stored Documents should not be long-term archived until they are no longer needed	Could be a legal requirement for some organizations How long does CIC keep it? Provide some examples Emphasize the importance of tracking Could be influenced by the type of issue
4. Timing of investigation response	4 and 5 are covered by AM discussions on 'initial response'. When review write-up from Lori should revisit this table to make sure that everything is covered.	Example if far away, could call local industry to investigate What makes something urgent/not urgent? -odour could indicate that there is an emergency and the response would reflect that
5. Determining urgency of concern and appropriate investigation response -this type of matrix does not currently exist, but we can provide some considerations that you can consider when determining your investigation response, including: -Upset or routine operations at potential source? - Filling out the decision tree (bottom boxes relating to source) in order to		All complaints are valid. It's always urgent for the caller. Need to decide how to use available resources (ex. Wake someone up at 3am to investigate). It can take time to change a process to reduce an odour. Most complaints aren't urgent. Many times a situation can be resolved without a field visit. <i>Urgency – do they send an email to weekend person, call directly, call on Monday</i> Could be valid but maybe there is nothing to be done about it What do you say when you determine that you shouldn't go out to investigate?

<p>determine source (to help you determine where to start your investigation not to point fingers in front of the caller)</p>		
<p>6. If source is found, should try to find root cause (using root cause analysis) -Make a very short reference to it in the section only as being covered by PMTG.</p>	<p>If source is found, should try to find root cause (using root cause analysis) Usually a long-term. Could be short. Could be multiple sources. -Make a very short reference to it in the section only as being covered by PMTG. -See 'Notes' column</p>	<p>Usually responsibility of the industry (not government). Usually a long-term. Could be short. Could be multiple sources. Difficult to get. Don't want call operator to speculate. This is "stage 3" investigation. This is more mitigation. Sometimes the root cause is a standard practice. It will still smell. The root cause is acceptable. We're not managing for zero odour. If the root cause is not acceptable, can we do anything about it? Getting at the cause of the event rather than dealing with the symptoms only This can be a longer process Could never get to the root cause or could not be solveable We're not sure about the word "root cause"</p>
<p>7. Alternative data sources (other than the complainant, such as monitoring stations)</p>	<p>Being aware that there are other data sources and tools that are out there Give a few examples: – Weather stations – Other industries in the area – Calling someone in the area – Previous investigator reports – Community members/input – Trends (ex. Seasonal fluctuations in</p>	<p>Where available. Can be useful, example wind direction can help determine source. Need to be careful of false positives. Monitoring stations don't necessarily look for odour and so can't necessarily provide data. Need to be clear about what monitoring stations can and can't provide. Need to note these limitations in this section.</p>

	<p>activities) – relates to 12</p> <p>-relates to odour assessment</p>	<p>Providing information on how to access this data (what is and is not available).</p>
<p>8. Multiple calls regarding the same issue (trends) -How this impacts your <u>investigation</u> (not how to deal with them on the phone)</p>	<p>Could make the need for the investigation more urgent Doesn't change the validity of the complaint (one complaint is just as valid as multiple) Could give you an idea about the geographic extent of the issue Look for patterns (similarities and differences) within the calls (ex. Time of day) to assist with the investigation</p>	<p>If are already working on the issue, may not need to go out and investigate. If receive many calls with the same complaint, can indicate a trend. Can reassure that is already being investigated.</p>
<p>9. Who are your partners in the investigation (ex. airshed zones, NRCB, environmental public health)</p>	<p>Same main points as already included in draft material, address it in the general section</p> <p>Need to know who they are Could help to identify source and address the complaint Need clarity about who's doing what</p>	<p>Provide high level guidance only (we're not writing a field manual). This is something that the investigator should be aware of.</p>
<p>10. What is considered closure?</p>	<p>The point at which follow-up with the individual complainant is done to communicate the results of the investigation. Must communicate with complainant (regardless of the outcome) Any mitigating actions that have been undertaken should be shared, if source identified share that with the complainant Sometimes is not possible to meet the desires of the complainant (still need to tell them this)</p>	<p>When investigator should consider the investigation closed. Appropriate follow-up with complainant regardless of outcome (i.e. whether something can be done or not). The point at which follow-up with the individual complainant is done. We won't be covering the circumstance of a group that is complaining. We're focused on individuals.</p>

	Closure of the complaint may not necessarily mean that the issue itself is fully resolved	
11. Correspondence with complainants (who, how, what)	<p>If you're working with other agencies, decide who is responsible for what</p> <p>Ties into data collection (how to follow-up)</p> <p>Relates to overall policy that we've previously discussed</p> <p>Knowing who within your organization is able to speak with complainants and has the authorization to share information (communications protocols, media contact)</p> <p>Relates to 'Corresponding with Complainant' section from draft material</p> <p>Communicate with complainant by their preferred method (that an organization is also able to do, are there legal ramifications to communicate by email? Most organizations do it by phone. Don't know who email might be forwarded to)</p> <p>Should keep a record of when you communicate with complainants</p>	<p>Might be overlap with some of the other topics</p> <p>Ex. One on one telephone conversations is more personal than an email</p>
12. Knowing what are the local odour sources	<p>Useful to know about trends (ex. The pond smells most strongly in spring)</p> <p>Knowing the odour-producing industries/activities in your area and their routine operations</p>	<p>Ex. In a particular area, odours are likely in the spring</p> <p>Ex. In a particular area, here are the main odour-producing activities</p>
13. Existing protocols to deal with that issue may affect level of response (i.e. regulation)	<p>Be aware of any regionally specific protocols that need to be followed</p> <p>Can be grouped with 12</p>	Awareness