



Multi-Agency Emergency Preparedness in Parkland County

Issues Review and Recommendations Report

December 2009

Parkland County, ERCB and Government of Alberta Steering Committee



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BACKGROUND

On February 13, 2009, a meeting was held between representatives of Parkland County and the Energy Resources Conservation Board (ERCB), which is the provincial agency responsible for regulating oil and gas development in Alberta, including the development and implementation of industry's Emergency Response Plans (ERPs). In addition to the ERCB, other Government of Alberta agencies including Alberta Energy, Alberta Health and Wellness (AHW), Alberta Health Services – Edmonton Zone (formerly Capital Health) (AHS), Alberta Municipal Affairs (Municipal Affairs) and Alberta Emergency Management Agency (AEMA) attended the meeting. The purpose of the meeting was to identify and address the concerns that prompted Parkland County Council to pass the Industrial Activity Emergency Response Plan Review and Approval Bylaw 60-2008.

Several meetings were held and, in order to address Parkland County's commitment to public health and safety, it was determined a Working Group should be struck to understand, clarify, identify and collaboratively seek solutions to public health and safety and emergency preparedness issues/concerns related to jurisdiction, gaps and overlaps of activities, and roles and responsibilities of the local municipal authority, government departments and associated agencies, and the ERCB within Parkland County.

The scope of the group's work was limited to a review of existing emergency preparedness and response mandated roles and responsibilities, understanding of jurisdictions, and development of processes relating to the development, approval and implementation of oil and gas emergency response plans in Parkland County.

The Working Group was directed to utilize the following strategies identified in the Terms of Reference:

- Review and understand each participating agency's legislation, roles and responsibilities, and processes or practices currently in place for the development, approval and implementation of emergency preparedness and response plans within Parkland County:
- Identify gaps, overlaps, key issues and concerns.
- Develop a process for addressing identified gaps/overlaps and issues/concerns.
- Develop processes/mechanisms for future on-going collaboration.
- Develop a draft communication strategy to inform stakeholders, including the public, of the progress of the Working Group.
- Develop a draft report of the findings of the group's work to be presented to the Parkland County/ERCB/GoA Steering Committee including any recommendations to the Government of Alberta and its regulatory agencies that may be appropriate in addressing identified gaps and/or overlaps.

The Working Group focused on identifying opportunities to address Parkland County's issues while keeping in mind the potential for provincial application and impact. The results of the Working Group's findings are contained in this report, which is broken down into three components: Issue Identification and Proposed Resolutions, Future and On-going Collaboration, and Communications Strategy.

PART I ISSUE IDENTIFICATION AND PROPOSED RESOLUTIONS

Emergency Response Plan (ERP) Development and Local Authority Consultation

Parkland County identified a number of concerns that caused the County to pass the Industrial Activity Emergency Response Plan Review and Approval Bylaw 60-2008. Many of these concerns related to ERCB's Directive 071 Emergency Preparedness and Response Requirements for the Petroleum Industry (Directive 071) and the need for improved clarity regarding consultation on roles and responsibilities between the local authority and the licensee.

Working Group Review:

Over the course of several meetings, the Committee explored the different aspects of Parkland County's concerns regarding emergency response plan development and consultation under Directive 071. The sub-issues, along with the proposed action and agency responsible to bring forward the resolution, are identified below.

The ERCB had already planned to release a revised version of draft Directive 071 for stakeholder feedback in early 2010. The ERCB will incorporate changes proposed by the Committee into that draft and release it for stakeholder feedback as planned some time in the first quarter of 2010. The proposed changes to draft Directive 071 Section 4 - Public and Local Authority Involvement in Emergency Preparedness and Response are included under each of the sub-issues below. Appendix 1 is the current Directive 071, Section 4 and is provided as a reference.

A. Definition of the term "local authority" (ERCB Directives vs. Municipal Government Act/Emergency Management Act)

The definition of "local authority" in ERCB Directive 056 Energy Development Applications and Schedules (Directive 056) and Directive 071 is not consistent with the definition in the *Emergency Management Act* or the *Municipal Government Act*.

Working Group Review:

The term 'local authority' found in an ERCB directive is defined in the back of each directive. The term is not meant to be congruent with legislation or organizations outside of the ERCB.

Proposed Action:

The following change to Directive 071, Appendix I Definition of Local Authority is proposed to address any potential confusion regarding consultation:

Local authority	A local authority is considered to be
	8) the council of a city, town, village, summer village, specialized municipality, or municipal district;
	9) in the case of an improvement district or special area, the Minister of Municipal Affairs;
	10) the settlement council of a Métis settlement; or
	11) the band council of a First Nations reserve.

Champion:

ERCB

B. Defining “consultation” with the local authority

The term “consultation” is not clearly defined in Directive 071, leaving it up to the licensees to establish their own level of consultation with the local authority.

Working Group Review:

We need to ensure that the consultation process does not create a barrier to development. Licensees or applicants who are responsible and want to engage cooperatively and collaboratively should not be punished for a local authority’s inability or unwillingness to participate in ERP consultations.

Proposed Action:

Proposed changes to Directive 071 include the addition of Section 4.4 Local Authority Consultation, that more clearly defines consultation expectations.

Champion:

ERCB

C. Identification of site-specific issues

Lack of clarity in Directive 071 regarding local authority consultation caused instances of ERPs being developed by planners without input from local authority on specific areas of concerns (target hazards).

Working Group Review:

Licensees should involve local authorities at an early stage in planning an energy development and participant involvement program and should attempt to resolve potential and/or outstanding issues/concerns.

Proposed Action:

This issue is addressed in the following proposed changes to Directive 071, Section 4.4 Local Authority Consultation:

- how will disagreements with the local authority be handled?
- the ability of the local authority to commit responders to an incident. This could include law enforcement, fire department, municipal and/or local disaster services capable of responding to a specific hazard. This would also include the ability of the local authority to coordinate and handle notification, evacuation, and sheltering outside of the EPZ.

Champion:

ERCB

D. Documentation submitted to the ERCB indicating there has been consultation with the local authority

Lack of clarity in Directive 071 regarding local authority consultation caused instances when licensee was consulting with staff not in a position to speak on behalf of the local authority.

Working Group Review:

It is important to provide direction for the licensee without imposing a requirement on local authorities who may not have the interest or capacity for consultation.

Proposed Action:

This issue is addressed in the following proposed changes to Directive 071:

Section 4.2 Preparing for the Public Involvement Program

- the local authority's director of emergency management (or such designate as established by the local authority) for all municipalities within and adjacent to the EPZ, and

Section 4.4 Local Authority Consultation

A local authority may ask licensees to adhere to certain communication and consultation protocols when consulting with the municipality on roles and responsibilities pertaining to emergency response or it may decide that a formally developed protocol is unnecessary. The extent of the protocols is often determined by the parameters of the operation, local authority capacity, and the activity within the municipal boundary.

- What is the level of contact desired? Who will be the initial contact, subsequent contact (if needed) and alternate contacts at the local authority?

Champion:

ERCB

E. Ability to see the final ERP after consultation with the local authority prior to submission to the ERCB

Existing process includes consultation with local authority prior to development of an ERP but there is no requirement that the ERP be submitted to the local authority for review to ensure recommendations or changes to the plan are included prior to submission to the ERCB.

Working Group Review:

Different options to address this concern were discussed for inclusion in Section 4.4 Local Authority Consultation in Directive 071:

- Applicant to provide consultation notes and agreement with local authority to ERCB when submitting ERP.
- Applicant to provide date on final ERP that was reviewed and accepted by the local authority and applicant prior to submission to the ERCB.
- ERP review to include contacting local authority in some manner to determine if ERP reflects discussion.

- ERP to be submitted to municipality for review prior to being submitted to the ERCB.

Proposed Action:

This issue is addressed in the following proposed changes to Directive 071, Section 4.4 Local Authority Consultation:

- does the local authority wish to review the final ERP with revisions prior to submission to the ERCB?

Champion:

ERCB

F. Dealing with outstanding concerns on an ERP after consultation with local authority concluded

Directive 071 provides for third party dispute resolution if the licensee is unable to come to a mutual understanding regarding roles and responsibilities with the local authority. There does not seem to be a mechanism in place should the local authority have outstanding concerns with the ERP and how those concerns would be managed and addressed.

Working Group Review:

ERCB endorses third party dispute resolution services through independent practitioners to assist in resolving the parties' concerns. If appropriate and with agreement from both parties, the ERCB may provide facilitation through its Appropriate Dispute Resolution Program.

Proposed Action:

Exists in the current Directive 071 and further addressed in the following proposed changes to Section 4.4 Local Authority Consultation:

If the licensee and the local authority fail to reach an agreement on roles and responsibilities, the ERCB encourages the use of third-party dispute resolution services through independent practitioners to assist in resolving the parties' concerns. If appropriate, and with agreement from both parties, the ERCB may provide facilitation through its Appropriate Dispute Resolution Program. The licensee is expected to close the consultation loop by explaining how the ERP will handle those concerns. This should include a discussion of next steps and an explanation of how the licensee will meet any commitments made during the local authority consultation process with an emphasis on ongoing information sharing.

If changes to the ERP are necessary as a result of public consultation, the licensee is required to advise the appropriate local authority and other government agencies.

The ERCB also strongly encourages the licensee to support and work with local synergy groups that have been established in areas throughout the province, whenever possible.

Champion:

ERCB

G. Understanding the roles and responsibilities of a local authority during an event or during a State of Local Emergency

Directive 071 requires licensees to be aware of legislation that governs and empowers local authorities in an emergency. However, some ERPs that have been developed fail to reflect an understanding of provincial emergency management legislation and the responsibilities placed upon a local authority under that legislation.

Working Group Review:

ERPs provide for the response within the prescribed EPZ but there needs to be coordination between the licensee and the local authority for an effective response within and outside of the EPZ. This also includes an understanding regarding legislative and legal responsibility of the local authority for public safety. A declaration of a State of Local Emergency by the local authority is significant and the licensee needs to be aware of the potential impacts and the possible requirement to relinquish command to the local authority.

Note: Section 7(a) of the *Municipal Government Act (MGA)* provides municipalities with the broad authority to pass bylaws for municipal purposes, with respect to the safety, health and welfare of people and the protection of people and property. Section 551(1) declares that, in an emergency, a municipality may take whatever actions or measures are necessary to eliminate the emergency. This section applies whether or not the emergency involves a contravention of the *MGA*, an enactment that the municipality is authorized to enforce or a bylaw. **A state of local emergency does not have to be declared to exercise powers under section 551 (1).**

Proposed Action:

This issue is addressed in the following proposed changes to Directive 071:

Section 4.3 Local Authority Jurisdiction in Emergency Response:

The local authority of each municipality is responsible for the direction and control of emergency response within its geographical jurisdiction in accordance with the following Acts:

- Section 551(1) of the *Municipal Government Act*, and
- Section 11 of the *Emergency Management Act*, during a State of Local Emergency.

It is very important that a licensee

- recognize that local authorities already have an emergency response structure in place, and a Municipal Emergency Management Plan (MEMP) that contains a broad framework to manage and respond to major emergencies and disasters. The licensee should be familiar with the structure of an MEMP, which can be accessed through each municipal director of emergency management.
- be familiar with the roles and responsibilities of the local authority in protecting members of the public within the municipality and be prepared to work with the local authority so that those objectives are met.

- recognize that local authorities may need to participate in unified command or assume control of an incident for legal or jurisdictional reasons particularly if there is a need to declare a State of Local Emergency.
- recognize that the local authority has jurisdiction in emergency response for its municipality and be prepared to relinquish control of the emergency to the local authority upon request.

Section 4.4 Local Authority Consultation

- continuing roles and responsibilities once the MEP has been activated

The local authority may wish to discuss its roles and responsibilities in emergency response with the licensee. This should include, but is not limited to the following:

- the mandated role and responsibility of the local authority to handle an emergency within its municipality under the *Emergency Management Act* and the *Municipal Government Act*,
- the process of issuing a State of Local Emergency and its role in the downgrading emergency levels and stand down of an emergency,
- when the MEP is activated and the local authority's roles and responsibilities,

ERCB and AEMA should explore developing programs that provide mutual training, education and exercises between the local authority and the licensees.

Champion:

ERCB and AEMA

H. Review and consultation with local authority on corporate-level ERPs

Licensees are not required to consult with the local authority when preparing corporate-level ERPs.

Working Group Review:

Licensee corporate-level ERPs are not reviewed and approved by the ERCB. If the local authority requests to review a licensee's corporate-level ERP, that would be discussed with the licensee during the public involvement program. The local authority can request to review the corporate ERP if they wish.

Proposed Action:

None.

Note: there is some ongoing confusion by the local authority regarding the different types of ERPs, when they are required, and the type of consultation for the different plans. This could be addressed as a part of a municipal education program.

Champion:

N/A

I. Lack of awareness and knowledge among licensees, planners, local authorities and other applicable government agencies

Effective emergency response is multi-faceted, requiring the efforts of all those who are directly or indirectly involved in the planning and the response.

Working Group Review:

It is the process of developing an emergency response plan that makes a response effective; therefore, it is important for the parties to build relationships and obtain a level of trust and understanding as part of the planning process. There also needs to be opportunities to discuss emerging issues and concerns.

Proposed Action:

ERCB Community and Aboriginal Relations will initiate discussions with interested parties in an effort to assist in building relationships between the parties. The Municipal Oil and Gas Liaison Committee is also meeting on a quarterly basis; this venue could also be utilized as an opportunity to discuss issues and share successes between the different groups and agencies.

Champion:

ERCB Community and Aboriginal Relations

J. Resolution of community impact concerns

Licensees prepare and conduct the public involvement program independent of the local authority during the planning, operational and post-incident phases.

Working Group Review:

At any time during the planning, construction, and operation of a project, the licensee must attempt to address outstanding concerns/objections raised by potentially affected or interested parties. There are instances when the public will approach the local authority with concerns regarding proposed projects; rarely, however, is the local authority engaged or part of the public consultation process.

Proposed Action:

This issue is addressed in the following proposed changes to Directive 071:

- does the local authority wish to be included in public consultations (e.g. planning, open houses)?

Champion:

ERCB

PART II FUTURE AND ON-GOING COLLABORATION

The proposed changes to Directive 071 were developed as an “80% fix,” meaning it was important to identify potential changes that would deal with issues that were prevalent not only in Parkland County, but elsewhere in the province, and obtain feedback from the various stakeholders. The 80% fix also means that there will need to be ongoing dialogue between the stakeholders for review and refinement of the Directive and provide opportunities for collaboration on other issues of concern.

The Working Group noted that the ERCB had initiated meetings with municipal oil and gas liaison officers or those with oil and gas development-related duties. As the function and purpose of the existing group has the potential to meet the criteria for future and on-going collaboration, the Working Group felt it was not necessary to duplicate the effort. The Working Group recommends that the ERCB continue its meetings with the municipal oil and gas liaison officers and continue working to bring in additional industry and government stakeholders as required for ongoing communication, collaboration and relationship building across the province.

PART III COMMUNICATIONS STRATEGY

In June 2009, representatives from ERCB, Alberta Municipal Affairs and Parkland County worked together to develop a communications strategy to share information with stakeholders regarding the formation of the Steering Committee and its goals and objectives: review Parkland County’s issues and propose recommendations to address those issues. The communications strategy included Parkland County holding a meeting with concerned residents and Parkland County and the ERCB jointly hosting a meeting with area licensees. Following these meetings, Parkland County issued a news release confirming its participation in the Steering Committee. A general announcement regarding the Steering Committee was jointly prepared by the Committee and released by Alberta Municipal Affairs to all municipalities and to the Alberta Urban Municipalities Association (AUMA) and Alberta Association of Municipal Districts and Counties (AAMDC), and by the ERCB to the Canadian Association of Petroleum Producers (CAPP) and the Small Explorers and Producers Association of Canada (SEPAC).

The Working Group was tasked with developing a communications strategy to inform each agency’s respective stakeholders including the public of the progress of the Working Group. As the Working Group adopted a very aggressive timeline in order to meet its deadline, there were no specific timelines or trigger points for progress updates. Parkland County and the government agencies have specific internal communication protocols and all representatives have followed those protocols.

As the final report has been adopted by the Steering Committee, the ERCB, Alberta Municipal Affairs and Parkland County will work together to coordinate an appropriate strategy for communication for all stakeholders:

ERCB Stakeholders: CAPP, SEPAC, and licensees

Alberta Municipal Affairs Stakeholders: AAMDC, AUMA and individual municipalities

Parkland County stakeholders: residents including special interest groups in the West Parkland region

The communications strategy will include next steps including the ERCB’s process for seeking input from different stakeholders for proposed revisions to Directive 071, including timelines for input, review and adoption. Announcements will be vetted through the members of the Steering Committee prior to release to the stakeholders.

APPENDIX 1 ERCB Directive 071, 2008 – Section 4 – Public and Local Authority Involvement in Emergency Preparedness and Response

ERCB Directive 071: Emergency Preparedness and Response Requirements for the Petroleum Industry, 2008

Current Version

Section 4 – Public and Local Authority Involvement in Emergency Preparedness and Response

4 Public and Local Authority Involvement in Emergency Preparedness and Response

4.1 When are Notification and Consultation Required

- 1) The licensee must carry out public and local authority⁴ notification and consultation for situations outlined in Table 2.

Table 2: Notification and consultation requirements

Situation	Notification and Consultation Requirements	
Developing an ERP - Sour well site-specific - Sour operations - HVP pipeline - Cavern storage facility	<p>Notification of and consultation with members of the public within the EPZ are required prior to submitting an application to the ERCB for approval when</p> <ul style="list-style-type: none"> - developing a sour well site-specific drilling and/or completion ERP - developing a sour operations ERP - developing an ERP for HVP pipeline and cavern storage facilities <p>Consultation is required with the local authority and others listed in Section 4.2 to confirm and coordinate each party’s roles and responsibilities.</p> <p>Notification and consultation is required when an existing EPZ either increases or decreases from its current size based on the following:</p>	
Change in EPZ size	Change	Action
	No change to size of EPZ	No additional notification or consultation required
	New EPZ is smaller than current EPZ	If the EPZ boundary is adjusted, residents that are no longer within the EPZ and the local authority are to be notified and informed of the change.

⁴ First Nations Reserves and Métis Settlements within the EPZ are considered to be local authorities and are required to be notified and consulted as a local authority.

	New EPZ is larger than current EPZ	Residents within the expanded portion of the EPZ and the local authority are to be notified and consulted as per requirements of Section 4.3.
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4.2 Preparing for the Public Involvement Program

- 2) The licensee must identify all residents and local authorities within and adjacent⁵ to the EPZ.
- 3) If an EPZ intersects an urban density development, the licensee must include the entire development within the EPZ for the purpose of conducting the public involvement program.
- 4) If an EPZ includes a portion of an urban centre, the licensee is not required to identify each individual residence within the urban centre; however, contact must be made with the appropriate urban director(s) of Emergency Management to review key emergency response information and confirm and coordinate each party's roles and responsibilities.
- 5) The licensee must identify in its ERP all urban density developments, campgrounds, and public facilities, such as schools, community centres, and senior citizen centres within the EAZ; however, direct notification and consultation is not required.
- 6) Prior to commencement of the public involvement program, the licensee must confirm and coordinate roles and responsibilities, in accordance with protocols established with
 - the local authorities,
 - the director(s) of emergency management(or designates/deputy directors) for all municipalities within and adjacent to the EPZ, and
 - the local RHA or applicable federal health branch.,

Under Section 11 of the Emergency Management Act, the local authority of each municipality is responsible for the direction and control of the local authority's emergency response. The local authority's Municipal Emergency Plan (MEP) describes its framework for response to major emergencies and disasters. The licensees should be familiar with the structure of a MEP which may be accessed through the Alberta Emergency Management Agency.

- 7) The licensee must attempt to reach a mutual understanding with local authorities on the specific needs and roles and responsibilities of each party during an emergency and include a summary of the roles and responsibilities in its ERP reflecting the mutual understandings.

⁵ See Appendix 1: Definitions for the Purposes of *Directive 071*.

This is to ensure that there is no confusion or misunderstanding of the roles and responsibilities in the event of an incident requiring activation of the ERP. If the licensee and the local authority fail to reach a mutual understanding on roles and responsibilities, the ERCB encourages the use of third –party dispute resolution services through either local synergy groups or independent facilitators to assist in resolving the parties’ concerns. If appropriate, and with agreement from both parties, the ERCB may provide facilitation through its Appropriate Dispute Resolution program.

If changes to ERPs are necessary as a result of public consultation, the licensee is required to have further discussions with the appropriate local authority and other government agencies.

The ERCB also strongly encourages licensees to support and work with local synergy groups that have been established in areas throughout the province, whenever possible.

4.3 Conducting the Public Involvement Program

8) The licensee must notify or notify and consult those listed in Table 3.

Table 1. Who to notify or notify and consult within the EPZ

Notification and Consultation	Notification Only
Permanent and part-time residents, including those residing on dead-end roads beyond the EPZ where occupants are required to egress through the EPZ.	Nonresident landowners and farmers renting land who don't live on the property but whose lands are within the setback distance as outlined in <i>Directive 056</i> . These persons must be considered in the development of the ERP and be advised that their property lies within the EPZ through an information package sent by registered mail.
Business owners and/or operators and industrial operators, including oil and gas operators with manned facilities.	Registered trappers, guides, outfitters, and registered grazing lease and allotment users.
Private and public recreational property owners, operators, and occupants.	Oil and gas operators with unmanned facilities (e.g., wells).
Rural public facilities and publicly used development, such as schools, community centres, registered campgrounds, and picnic areas.	Owners of rented residences in an EPZ must be advised that their property lies within the EPZ through an information package sent by registered mail.

9) The licensee must

- conduct the consultation through face-to-face visits with all requisite individuals;
- offer to conduct the consultation by telephone if residents do not wish to meet the licensee representative face-to-face;
- offer to send residents a public information package by registered mail if they do not wish to participate in the consultation process; regular mail is acceptable if the resident agrees;
- review key emergency response information with members of the public identified in the EPZ who wish to participate in the consultation process, to familiarize them with potential emergencies and corresponding public protection measures pertaining to emergency response procedures; the licensee representative is expected to have the necessary knowledge to provide details of the emergency response procedures in place and to address questions and concerns that may arise; and

- address any request for additional information or for modifications to the ERP by the individual consulted.

10) The licensee must notify residents of urban centres that they are within the EPZ and provide details of the public protection measures available in the event of an emergency. This may be done through a combination of appropriate notification methods, such as mail outs, open houses, and newspaper advertisements.

The ERCB recognizes that the licensee may sometimes have difficulty establishing contact or meeting in person with

- residents who may be away for extended periods of time, have “no trespassing” signs posted on their property, or have unlisted telephone numbers; and
- nonresidents, such as registered trappers, industrial operators, and recreational property owners, operators, and occupants.

11) The licensee must attempt to contact these persons to arrange a suitable meeting place and time to address any questions and concerns regarding the ERP or response procedures or provide a public information package by registered mail with an offer to meet. It is the licensee’s responsibility to show that reasonable efforts were made.

4.3.1 Public Information Package

Although the public information package may vary in content, it should contain sufficient information to ensure that the persons contacted understand the nature of the operation, the impact an emergency may have on them, the procedures in place to respond to an emergency, and the public protection measures. The public information package does not have to be submitted with the ERP; however, the ERCB may request that it be submitted if

- the ERP is part of an ERCB hearing,
- a post-approval audit is being conducted on the ERP, or
- the ERP has been selected under the ER Assessment Program.

12) The licensee must

- develop a public information package for distribution during the public involvement program, and
- provide all persons identified in Table 3 with a copy of the public information package.

The licensee should provide a reasonable amount of time, having regard for the specific circumstances of each individual, for recipients to review the public information package and have questions and concerns addressed.

13) The licensee must, as a minimum, include the following in the public information package:

- a brief overview of the operations;
- identification of the potential hazards associated with the wells, pipelines, or facilities;

- range of release rates, release volumes, H₂S concentrations (if applicable) and EPZ determinations for all wells, pipelines, and facilities;
- a map of the operations in the general area;
- a 24-hour emergency licensee contact telephone number¹ (the ERCB requires that a call to this telephone number initiates immediate action), a local ERCB Field Centre 24-hour emergency telephone number, and local authority office telephone numbers;
- a description of potential health impacts that could result from exposure to H₂S, HVP product, or sulphur dioxide (SO₂),² if applicable;
- information on special emergency procedures unique to the community, such as those used by hospitals and schools, that could affect emergency response;
- information on public protection measures for evacuation, sheltering, and ignition; and
- procedures in place to respond to an emergency.

For EPZs that cover a large geographic extent, a licensee may elect to create multiple information packages designed to address specific planning areas and include the applicable ranges of release rates, volumes, and EPZ determinations for each area.

The licensee should provide non-confidential information requested by a resident for any well, pipeline, or facility that is included in the public information package.

14) Prior to commencement of the public involvement program, the licensee must provide a copy of the public information package to the local ERCB Field Centre so that ERCB staff can respond to questions and concerns from area residents.

4.4 Information Required From the Public Involvement Program

15) A licensee must attempt to obtain the following information for incorporation into its ERP:

- exact location of the residence, place of business, or public facility, including egress route issues (legal description or address);
- name of key contact and a 24-hour contact telephone number (home, business, cell phone, or other) and an alternate contact, if possible;
- names of all family members in residence;
- number of occupants, specifying adults and preschool and school-age children;
- names of those with special needs or specific requirements; the licensee representative is expected to inform members of the public that they can be considered to have special needs and require early notification or evacuation without having to divulge their personal health issues;
- any additional concerns or comments; and any other information deemed necessary to allow for effective emergency response procedures to be developed.

¹ This number must also be posted at all licensee wells, pipelines, and facilities.

² Refer to documents such as Alberta Health and Wellness *Health Effects Associated with Short Term Exposure to Low Levels of SO₂* (April 2006) and *Health Effects Associated with Short Term Exposure to Low Levels of H₂S* (July 2002).

Members of the public have the right to **refuse** to provide their personal information. The licensee should discuss the protection of rights under the *Personal Information Protection Act (PIPA)* with members of the public and clearly explain that the information is important to provide an effective emergency response and ensure their protection and safety.

Personal information in the hands of the licensee is governed by *PIPA* and when it is filed with the ERCB by the *Freedom of Information and Protection of Privacy Act*. The licensee should acquire only information necessary to implement the ERP and should provide this information to key emergency responders and the ERCB.

If members of the public are unwilling to provide personal information, the licensee must consider those residents as having special needs.

Although public safety is the primary purpose of emergency preparedness and response, the licensee is expected to address livestock and pet safety in its public involvement program and ERP, if feasible.

Other guidelines, such as CAPP's Guidelines for Effective Public Involvement, may also assist in preparing for and conducting public involvement programs.