



# A guide to managing public nuisance

## PURPOSE

Small-scale sewerage services licensees operate wastewater collection, treatment and disposal system handling less than 10,000m<sup>3</sup>/d and can serve guest worker accommodation facilities, industrial sites, hotels and leisure facilities or small communities.

This guide is aimed at helping Small-scale Sewerage Services Licensees understand the requirements of the Public Nuisance Condition in their Licence.

The guide aims to provide information on the:

- format of the public nuisance complaint register licensees must keep;
- approach licensees must take to resolve public nuisance complaints; and
- reporting requirements for public nuisance issues.

## BACKGROUND

The Bureau believes that a public nuisance is anything that disturbs the general public's reasonable use of property, endangers life and health, or is offensive to the general public.

In a wastewater context a public nuisance could be an odour emission; a wastewater flooding incident; a noise or the attraction of vermin and insects.

A public nuisance incident typically results in a complaint that is defined as a verbal or written expression of dissatisfaction about an action or failure to act by the licensee or its contractors and includes correspondence received by letter, fax, email, telephone or text message.

## LICENCE REQUIREMENTS

The public nuisance licence condition requires small scale licensees to:

- take all reasonable measures to plan, design, construct, operate and maintain the wastewater collection, treatment and

disposal systems so as to minimise public nuisance;

- keep a record of all complaints associated with public nuisance.
- take all necessary steps to remedy complaints in an efficient and timely manner
- provide the Bureau with information relating to compliance as requested.

## COMPLIANCE REQUIREMENTS

### PUBLIC NUISANCE REGISTER

Licensees must keep a register of all complaints associated with public nuisance to comply with the licence condition.

This register must include information on:

- the person or entity making the complaint
- details of the complaint
- the time the complaint was received and the action carried out to resolve it; and
- any other information which provides context to the complaint.

A template for a complaint register is set out in Annex A of this guide and small scale licensees must keep a register with the information set out in the template to meet the requirements of the licence.

The complaint register for each calendar year must be submitted to the Bureau by 31 March of the following year

### REMEDYING COMPLAINTS

Licensees must have a procedure in place which ensures the timely and efficient resolution of any complaint directly and indirectly related to public nuisance arising from licenced activities.

The procedure should also ensure that the licensee acts consistently and fairly.

The procedure must include the following elements:

- a variety of methods to inform people how to make a complaint such as posters, leaflets or staff briefings
- a range of options for a person to make a complaint, e.g. telephone hotline, electronic communication channel or complaints box;
- a number of first contact points
- a method for recording information about the complaint
- a system for assessing the complaint and initiating any action required to resolve it; and
- a process for keeping the person making the complaint informed of any outcomes.

The process must take account of the likely sources of complaints and ensure that the awareness campaigns and complaint communication methods match the preferences and capabilities of the people likely to make a complaint. Figure 1 summarises potential sources of complaints; first contact points for people making a complaint and communication and awareness

options that a small scale licensee may use.

Licensees shall ensure all staff involved in recording or resolving complaints know how to register and investigate complaints and how to complete corrective actions.

Staff should also respect the opinions of a person making a complaint and treat them fairly and consistently.

The information collected about complaints and the work carried out to resolve any related public nuisance should be reviewed and used to address any problems found in the wastewater system.

Annex B highlights a business process for receiving and resolving public nuisance complaints in a timely and efficient manner that would meet the requirements of the licence condition.

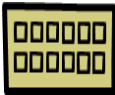



|                                    | <b>Guest Worker Accommodation</b>   | <b>Industrial Sites</b>   | <b>Hotels &amp; Leisure Facilities</b>  | <b>Small Communities</b>  |
|------------------------------------|---|---|---|---|
|                                    |  |  |  |  |
| <b>Person making the complaint</b> | Staff<br>Guest Workers<br>Visitors<br>General public                                | Staff<br>Visitors<br>General public   | Guests<br>Staff<br>General public   | Residents<br>Staff<br>General public  |
| <b>First contact points</b>        | Site reception<br>Security office   | Site reception<br>Security office<br>EHS office                                     | Site reception<br>Switchboard<br>Maintenance team                                     | Site reception<br>Security office<br>Switchboard<br>Maintenance team                  |
| <b>Communication options</b>       | Complaint box<br>Telephone  | Complaint box<br>Telephone<br>email   | Telephone<br>Direct report<br>Social media  | Complaint box<br>Telephone<br>email<br>Social media                                   |
| <b>Awareness options</b>           | Posters<br>Staff briefings  | Posters<br>Staff briefings  | Posters<br>Leaflets<br>Social media   | Posters<br>Leaflets<br>Resident briefings<br>Social media                             |

Figure 1: Key complaint management issues

## INCIDENT REPORTING

The Incident Reporting Regulations 2008 require Licensees to report to the Bureau any major failure of any element of the collection, treatment or disposal system resulting in public nuisance including, but not limited to, flooding and odour.

## COMPLIANCE ASSESSMENT

### BUREAU APPROACH

The Bureau will assess compliance of the licensee against the public nuisance licence condition in several stages:

- the wastewater collection, treatment and disposal systems design and licensees operation and maintenance activities will be reviewed as part of the licence application process and the Bureau's ongoing compliance assessment procedures;
- Licensees will be required to submit a copy of their complaints register on an annual basis (quarter one of each calendar year for previous year)
- Licensees must report significant public nuisance incidents to the Bureau within 24 hours under the Incident Reporting Regulations.

### OTHER REGULATORS

Other regulators may impose additional reporting and management requirements for public nuisance issues.

Small scale licensees must ensure they comply with the requirements of the:

- Environment Agency Abu Dhabi (included in an environmental permit for the site);
- Emirate's Municipalities (set out in in any building permit or development approval);  
or
- The OHS Centre (through any approved EHS management plan).

## FURTHER INFORMATION

For further information contact the Regulation and Supervision Bureau's Wastewater Manager:

Tel: (02) 6543 666

Email: [wastewater@rsb.gov.ae](mailto:wastewater@rsb.gov.ae)

# Annex A: Template for Public Nuisance Complaint Register

[A Development Licensee]

Period from \_\_\_\_\_ to \_\_\_\_\_

| Customer Detail     |      |                    |                            |                        | Complaint Detail   |   |   | Time Detail<br>(Date and Time) |                    |                   |   | Further Information |
|---------------------|------|--------------------|----------------------------|------------------------|--|---|---|--------------------------------|--------------------|-------------------|---|---------------------|
| Complaint Reference | Name | Location / Address | Contact detail (telephone) | Contact detail (email) | Public Nuisance Location<br><small>(Collection / Treatment or Disposal system)</small> | Type<br><small>(Odour, flooding, Noise, or vermin and insects etc.)</small> | Method of complaint<br><small>(verbal or written)</small> | Reported                       | Site investigation | Incident resolved | Notification to person making the complaint |                     |
|                     |      |                    |                            |                        |  |   |   |                                |                    |                   |   |                     |
|                     |      |                    |                            |                        |  |   |   |                                |                    |                   |   |                     |
|                     |      |                    |                            |                        |  |   |   |                                |                    |                   |   |                     |
|                     |      |                    |                            |                        |  |   |   |                                |                    |                   |   |                     |



## Annex B: Public nuisance complaint procedure

