

CHEM TRUST AND GREENPEACE JOINT RESPONSE TO THE 2015 REVIEW OF THE UK CHEMICALS STAKEHOLDER FORUM

27th January 2015

CHEM Trust and Greenpeace consider that one of the most important roles of the CSF is to provide a forum to exchange views. Enabling this exchange of views between diverse stakeholders ensures that different stakeholders appreciate and understand the rationale for each other's positions and also perhaps the rationale for the UK government's position or the need for EU action. This exchange can also help modify stances and aids progress. Without such a forum, there is the potential for stakeholders to get entrenched views as they only discuss issues with like-minded people from their own 'group'. The tangible benefits of providing a forum for this exchange of views are difficult to quantify, but we consider it to be a vitally important role of the CSF.

We would like to point out that if the CSF were to change to a self-funding group, or a limited membership group, then the attendance of Environment and Health Groups and charities representing the public interest might well be more limited and thus not adequately serve this purpose.

Another important role of the CSF is to update members on current discussions in the EU. Being given an outline of the state of play with regard to both EU and various international discussions can help both industry and other stakeholders to refine their positions, as well as helping them to input into such processes in a timely manner.

In relation to the questions raised in the consultation, CHEM Trust and Greenpeace could support the following:

- That members who miss two out of four meetings in any twelve month period should be invited to re-affirm their commitment to the Forum, or recognise that their priorities have changed.
- Operating a waiting list for membership of the Forum. We feel that new groups wanting to join should be encouraged to make representation to DEFRA to that effect, and should be placed on a 'holding list' whilst awaiting a vacancy in the forum. When vacancies arise, DEFRA should ask the forum for feedback as to the most appropriate group on the holding list or approach another relevant body.
- Reconsidering the amount of support available for members to claim travel costs for attending meetings, recognising the benefits which they derive from membership of the Forum. Of course, we would not welcome such a move, but consider that, if cost savings are needed, this should be given consideration, providing it would not give rise to significant consequential changes to the composition of the CSF.
- Reducing the frequency of the meetings to 3 per year, but no fewer, in order to ensure that the Forum can maintain its critical mass, its momentum and its effective working relationships both within and between meetings.
- Appointing a Chair from Defra itself, providing continuity, whilst also likely reducing costs.

Neither CHEM Trust nor Greenpeace could support the following:

- The model of a rotating chair or rotating venue, as this would add to administration and would require a higher level of coordination. Rotating the venue would also likely lead to a significant increase in travel cost.
- Having a smaller Forum, of twelve full members on fixed 3-year appointments (which may include new interests not currently on the Forum); and a cohort of supporting, but less influential, Associate Members. This is because a larger membership embraces more industrial sectors as well as more environment and health NGO groups representing a wider breadth of civil society concerns. Moreover the cost savings would be minimal, or almost non-existent, if members were requested to meet their own travel costs other than in exceptional circumstances.
- That Forum members could be asked to make an annual contribution to the cost of running the Forum, for example via a membership fee, which could be modulated further for full and associate members. CHEM Trust considers that this is not a good way forward for a stakeholder forum because it would likely reduce the input from environment and health NGOs as compared to industry.
- Fixed term appointments - because if there is an organisation with particularly good outreach channels to others or good expertise it does not seem useful to make such groups rotate by default.