

The Institution of Environmental Sciences

The professional body for environmental scientists
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Framework for Regulations on Local Access Forums

A response by the Institution of Environmental Sciences to the consultation document issued on 31st July.

The Institution welcomes the opportunity to comment on the proposals. Whilst we have specific comments to make in respect of several of these, they derive from other, and more general, considerations in principle.

We believe that appropriate representation of users and owners is crucial to the satisfactory and fair operation of the system. We have some concern, however, that the process of appointment could prove less than democratic and that the regulations should be amended to ensure a more equitable process for constituting the forums. Too great an element of 'choice' is available to the appointing authorities, the restrictions on this choice in the regulations are insufficient safeguard and no monitoring system is provided over the process.

A further regulation is required enabling the Department to redirect an appointing authority where their operation of the process may be unsatisfactory. This could be instigated by a monitoring process or by a public appeal/complaint.

Proposals 1,3,4,6,8,9 and 11-16:

Are considered satisfactory.

Proposal 2 Geographical coverage:

A danger exists that geographical areas could be too large and a forum of 20 members would NOT be sufficiently representative of all localities. Wider consultation with the public should be necessary for the appointing authority before boundaries are set.

Proposal 5:

The element of PUBLIC invitation for application for membership is VITAL. Also an appointing authority's view of what is an 'appropriate' body is dangerous and leaves too much to individual CHOICE. Appointing authorities should be required to approach ALL appropriate organisations.

Proposal 7:

Members should serve a term of three years BUT with $\frac{1}{3}$ rd. retiring annually. Vacancies should be re-nominated with retiring members eligible for re-appointment. When there is competition for vacancies some form of independent selection or election should be put in place.

Proposal 10:

Similar comments as for Proposal 5.

Dr. R. A. Fuller
On behalf of:
The Institution of Environmental Sciences

15th October 2001