



Consultation Effective Consultation: asking the right questions; asking the right people; listening to the answers. Cabinet Office Consultation

September 2007

GM Freeze

GM Freeze is an alliance of 55 organisations calling for a moratorium on GM foods, the growing of GM crops for any purpose and on patents on genetic resources in agriculture, food production and forestry until the need for and safety of GM technology has been established and alternative approaches have been fully evaluated.

Our members include consumer groups, farming organisations, environmental groups, development agencies, religious groups, animal welfare groups and food companies.

This response is submitted on behalf of GM Freeze.

Summary

GM Freeze welcomes the Cabinet office consultation on *Effective Consultation*. However, we do not feel that the document is brave and bold enough to either tackle public mistrust of the current system or proposes a sufficiently radical alternative which is urgently needed to restore faith in the democratic process. The Government development of GM crops and food policy is an excellent example of how not to handle complex policy areas where the public has shown a good understanding of the issues and a willingness to engage and act politically and as consumers.

The following are key to "effective consultation":

- A commitment by government to listen and change policy and legislation as a result of public consultation;
- A commitment to publicly acknowledge policy changes arising from consultations;
- A commitment to place equal value all responses to consultations;
- A commitment to engage with the public and civil society groups at the earliest possible stage of policy development as practiced in Sweden;
- A commitment to use a range of the most effective means of consultation and run pilot schemes to test the best methods for each type of consultation and policy area;
- A commitment to fund consultations adequately and use trained staff to run them;
- A commitment to run consultation for a minimum of 12 weeks except in emergencies and to allow for longer periods in complex policy areas;
- A commitment to establish a well funded Parliamentary Committee to oversee the process of public consultation and deal with complaints.

Introduction

GM Freeze regularly responds to consultations by Government Departments and Agencies, devolved administrations and departments and scientific advisory Committees. In addition, we

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also respond regularly to EC consultations. We normally respond to consultation within the scope of our objectives and the competence of our staff and supporters.

In the past two years we have submitted responses of the following:

Defra

- On the application for BASF to release GM potatoes in England July 2006 and March 2007
- On the Implementation of the Environmental Liability Directive December 2006
- On the Better Regulation of Plant Varieties Seeds and Seed Potatoes March 2007
- On Action Taken to Control *Diabrotica virgifera* (the Western Corn rootworm) March 2007

DOE NI

- On the coexistence of GM, conventional and organic crops January 2007
- On the Implementation of the Environmental Liability Directive December 2006

National Assembly of Wales Government

- On the Implementation of the Environmental Liability Directive December 2006

Scottish Executive

- On the Implementation of the Environmental Liability Directive March 2007

DFID

- On the Strategy for Agriculture September 2005

Food Standards Agency

- On priorities for local authorities May 2006
- On labelling, competitiveness, consumer information and better regulation May 2006
- On determining GM presence in food and feed (in draft September 2007)

Advisory Committee on Releases to the Environment

- On Comparative Risk Assessment June 2006
- On GMOs and the soil October 2005

In addition we have also commented on GMO thresholds in seed to the European Commission (on line) in June 2007, commissioned a legal opinion of Defra's and the EC approach to the coexistence of GM, conventional and organic crops and conducted an opinion poll on the labelling of animal products produced using GM feed (June 2006). In the past, we have written to Minister concerning forthcoming GMO approval decisions before the Council of Ministers and Standing Committees, but we do this rarely now because the UK consistently votes in favour of such approvals regardless of the evidence submitted and contrary to the precautionary principle..

From this list it is clear that GM freeze takes time a trouble to respond on consultation which we think are significant to the policy on the introduction of GM crops and foods and the patenting of genetic resource used in agriculture.

General Comments on the Role of Consultations and the Current Consultation

Paragraphs 1.12 to 1.14 and annex 2 of the Cabinet Office consultation document both adopt very broad definitions of the meaning of "consultation" and "stakeholder".

1.12 Consultation is generally considered to be a form of engagement that is appropriate when the policy process is already underway and there is an intention to make changes

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or deliver specific outcomes. It therefore does not invite an open debate on very broad areas of public policy, nor does it empower those who participate with the final decision.³ However, things are not always clear-cut and there are cases where it may make sense to carry out some other types of public engagement, as well as consultation as part of one exercise. Some of the case studies in this document illustrate this and annex 2 discusses public engagement further.

1.13 Consultation should generally be seen as an integral part of policy development: consultations are an opportunity to seek evidence, validate existing evidence and expose preliminary policy analysis and options to scrutiny, so as to help the development of effective, efficient and proportionate solutions to a particular issue.

1.14 Consultations are generally aimed at “stakeholders”. For the purposes of this exercise, the term is used in a wide sense, meaning those outside of central Government with an interest in the topics under discussion. These may be organisations or associations, companies or individuals who take an interest in, or who might be affected by the new policy, the policy change or the proposed legislation. In many cases, members of the public are interested in Government consultations even if they might not be directly or immediately affected by the topics under discussion. Getting involved in Government consultations can lead to deeper levels of engagement and the Government maintaining a relationship with those who want to remain involved in specific policy areas.

And

Annex 2

Definitions

It is important to define the terms “consultation” and “stakeholders” to clarify the context and scope of this consultation exercise.

Public Engagement and Consultation

Public engagement in policy development and service design underpins a representative democracy. This engagement can take many shapes and forms and be undertaken at any stage of the policy process - from gathering ideas about how best to address an issue through to evaluating how well policy objectives were met. Engagement can lead to improved governance and accountability; build social capital, networks, inclusion and shared ownership of issues and help develop citizens’ confidence and knowledge about operating in the public realm. Another key benefit, of course, is delivering better policy and services. At those stages in the policy process where the Government has formed a preliminary policy analysis and developed options for scrutiny, it is right that this engagement takes the form of consultation. Here the objective is to listen fully and carefully so the Government can build up a broad evidence-base which allows for effective and efficient policymaking before decisions are made. Consultations which truly reach all those with an interest lead to better policies and reduce the risks of policies failing to meet their objectives and of unintended consequences and can lead to further engagement from experts and interested parties further down the line. It is sensible therefore to set out clearly a consistent set of expectations that Government sets itself at these policy stages where consultation, rather than other forms of engagement, is needed. However, while consultation serves a specific purpose in seeking evidence for policymaking and exposing preliminary analysis and options to scrutiny, it need not be a restrictive term when it comes to method. In other words, consultation should not be understood purely as meaning written consultation. While this may often be the most useful method for consultation, it is not the only medium, and certain policy areas, particularly because of those people who might be affected, may better be served by other forms of consultation. There is, for example, considerable value to be gained through supplementing written consultations with other forms of consultation and in maintaining regular contact with principal stakeholders. Many Government departments hold regular meetings with key players in their policy areas, referring to these as Policy

Forums or Stakeholder Forums. Such forums allow constructive dialogue to take place on policy objectives as well as on the detail of proposals. These discussions should be considered as consultation.

Stakeholders

Consultations are aimed at “stakeholders”. By stakeholders we mean those outside of central Government with a specific interest in the topics under discussion. These may be organisations or associations, companies or individuals who have a specialist interest or who might be affected by the new policy, the policy change or the proposed legislation. In very many cases members of the public are also stakeholders. Insofar as central Government department consultations are concerned, other central Government departments should not be considered “stakeholders”; Whitehall has internal procedures to co-ordinate and join up policymaking across Government. However, the public sector outside of central Government can be considered stakeholders and is free to respond to central Government consultations. The Cabinet Office strongly advises departments to work closely, before any public consultation takes place, with colleagues in other departments, agencies or local government bodies, etc. as relevant, and especially with those who may have to administer and/or enforce the policy.

GM Freeze agrees with most of the above. However, it is ironical that very little of what was written in the consultation document has actually been followed in practice in this consultation process.

GM Freeze found out about this consultation from the Food Standards Agency website when looking up consultation papers for which we had received emailed notification. In other words, we found out by chance. Thousands of groups and individuals around the country have responded to government consultations on a huge range of topics from airport expansions to energy policy to stem cell research, and yet there has apparently been no serious attempt to engage them in the current consultation exercise. A shame, because the Government could have learned much.

Instead the lists of consultees in the document (pages 28-29) reads like a list of the great and the good with a very heavy representation from industry groups and a noticeable absence of any regional, local, religious or women’s organisations. There are also some notable absentees from the sectors with which we mostly work, for example The National Trust, Action Aid, Christian Aid, War on Want, the World Development Movement, Pesticide Action Network, Sustain, The Soil Association, Compassion in World Farming, Unison, Transport and General Workers Union, the National Federation of Women’s Institutes and Town Women’s Guilds. Outside our immediate network, there are also some glaring omissions, for instance Shelter, RSPCA, Barnados, Childline and Transport 2000.

We are aware that the Cabinet Office is hoping that the “word will be spread” by other departments to their stakeholders but based on our experience this does not appear to be happening. We are also aware that two public events are being planned, but once again individuals or civil society groups would only find out about these by a chance from the Cabinet Office website after we had chanced upon the consultation on the FSA website.

It is therefore with a sense of foreboding about how the responses for this consultation will influence the way consultations are carried out in the future that we will proceed to address the questions posed in the document.

The Questions

We feel the ordering of the questions suggests that the Cabinet Office may well be more interested in comments of the current processes rather than of the principles behind that process. To address this issue, we have re-ordered the questions to place what we consider the most important ones first (although we stick to the original numbering from the consultation document).

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Question 5

When in the policy development process do you think the Government should consult stakeholders?

This question is the key to success for public engagement in policy formation. GM Freeze believes that consultation should commence as early as possible because this gives the best opportunity for the public to influence the direction of policy. Indeed in the case of the introduction of new technology, public involvement in decision making should commence during the development stage. This would assist researchers in avoiding directions for their research which the public would find ethically unacceptable.

Early consultation about policy or legislation also enables Government to get very early warning that they are “barking up the wrong tree” and avoid embarking on policies or developments which are deeply unpopular. Early consultation must involve members of the public as well as stakeholders. Our experience during *GM Nation? The Public Debate* in 2003, suggested that members of the public who engaged in the process at public meeting around the country asked highly pertinent questions like: “what’s the point of GM crops?”; “who benefits from them?; “is right to break down species barriers?”; “are they safe?” and “how can I avoid them if I don’t want to eat or grow them?” As neither Government nor the biotechnology industry were able to answer any of these fundamental questions satisfactorily, GM crops and foods have generally not been accepted into the UK except in the case of GM animal feed. One reason for GM animal feed being used in livestock, dairy and egg product is the failure of the EU governments to respond to public demand for animal products produced from GM feed to be clearly labelled as such. In 2006, GM Freeze, along with Friends of the Earth, commissioned an opinion poll on this issue and found that 87% of adults supported the labelling of meat, dairy products eggs if GM feed was involved in their production. Unfortunately, the Government continues to ignore this very clear message. This type of “we know best” response by Government and Government agencies to a clear public demand is not conducive to encouraging citizens to get involved in consultation processes at any level.

The introduction of GM crops is an excellent example of where Government consultation processes failed. In the late 1980s stakeholder meetings were too narrowly based to enable the real views of the public to be aired or heard by decision makers. Ethical issues, eg breaking species barriers with genetic engineering techniques, were not widely debated in public. The ethicists who were involved came from a very narrow band of opinion (eg The Church of England) and consequently even majority views were not heard let alone those of other minorities.

Successive governments have pressed ahead in supporting the development of GM crops through proactive ministerial support in public (including attacks on opponents of GM crops), research funding and selecting policy options which had little public support (eg the labelling example given above). This process culminated in the Government expending over £5 million of public money on the Farm Scale Evaluations (FSE) to provide evidence of the impact of GM herbicide tolerant crops on farmland wildlife which industry was not prepared to pay for themselves. So public money was used to test crops which the public opposed and for which there was no market and still is not. Ironically, the one crop, GM maize, which was given the go ahead by the Government as a result of the FSE, was then withdrawn by the company that developed it for commercial reasons after the results were published.

Consultation at an early stage would have revealed public concerns about GM crops which would have suggested that they would not be welcome in the UK and which should have led to a different policy from the Government:

- They represented a continuation of intensive production which was seen as very damaging to the UK countryside and wildlife and to produce poor quality food;
- Their safety was uncertain and the public did not wish to see further experimental tinkering with their food;

- They were owned and controlled by corporations, who appeared to be the main beneficiaries of the technology, many of which had a very bad record for safety and environmental protection;
- Scientific opinion on the safety of food was no longer trusted by the public following the BSE crisis;
- People had deep reservations about the patenting of genetic resources used in agriculture by corporations;
- People wanted a clear and unequivocal right to avoid eating GM food if they wished for a wide range of reasons not just personal and family safety;
- GM foods were appearing on supermarket shelves without prior consultation or public consent.

Question 6

Do you think more emphasis should be placed on alternative or supplementary approaches to consultation in a revised policy? What supplementary approach(es) would work best for you organisation?

GM Freeze would support a wide variety of approaches to consultations. This is particularly important for individual members of the public who, in our experience, remain highly suspicious of the motives behind government consultations and skeptical about how the outcomes will influence policy.

Re-gaining public confidence in the consultation processes therefore necessitates the introduction of new approaches such as in depth interviews, citizen panels and juries, public evidence hearings and focus groups.

There is still a place for the classical written consultation involving groups and individual with particular expertise or experience of the issues involved, but these must be publicised widely if they are to attract a creditable variety of response. Even here, more in-depth oral approaches would undoubtedly bring out more about the underlying feeling behind their initial reactions.

The fundamental problem faced by any government consultations is convincing people or organisations that the views they express will change a policy or a regulation. People generally believe that this Government listens to industry before citizens and therefore are very reluctant to commit time to processes they see as fixed from the start. A good example of where a Government consultation process appeared closed to alternative view came during the stakeholder meeting of DFID's Strategy for Agriculture (held in September 2005). At the meeting several people asked why the draft policy included such a strong commitment to biotechnology and were told that it "was non-negotiable". In view of the public disquiet about GM technology around the world, this was an extraordinary policy position for the Government to adopt, but also illustrates why the consultation processes of Government are viewed with cynicism by many.

Question 8

How do you rate the feedback you have seen from what improvement or changes would you like to see in relation to reporting back?

Generally, GM Freeze is far from impressed by the feedback issued by Government departments following consultations. When the number of respondent is relatively small from organisations rather than individuals, feedback tend to be better and attributes particularly view points to particular sectors

A good example of this is the Department of the Environment NI's feedback on the responses to the Environmental Liability Regulation in 2007.

However, when there is a high response rate on a contentious issue there is a tendency to grade the merit of the responses. For instance in the feedback on the massive response to the

proposed badger cull to control consultation in 2005/06, Defra's feedback divided the responses into four types:

- Stakeholder responses
- Substantive public responses
- Short public responses based on principle
- Emailed based campaign replies

In addition the feedback noted the numbers of petitions and number of signatures on each.

Although the overall percentage for and against the cull in principle was given, the opinion of stakeholders were reported separately. There is a danger that those who merely wrote or emailed expressing their opposition to the cull in principle could feel that their response is being viewed with less weight than those responses which answered all or most of the questions posed in the consultation. Those who gave a simple, in principle response against (the vast majority) may have taken the view that making a detailed response was not necessary as the questions in the consultation document related more to the rationale for the cull or the methods of carrying it out and were, therefore, irrelevant if you were opposed in principle to it.

Clearly consultations where there are contentious issues at stake, such as the badger cull or the contamination of crops and organic crops with GM will produce, attract larger responses than those dealing with a straight forward regulation or a highly specialised area of policy/knowledge. However, on occasions, even consultations which appear fairly straight forward may produce a large or more divided response.

In cases where opinion is divided, Government should be prepared to be more open to alternative ways to consult.

If they value the process of consultation, Government will need to convince people that final policy will reflect the views expressed.

GM Nation? The Public Debate provides an example where there was no commitment by Government at any stage to be guided by the outcome of the debate in its many forms. Despite the high written response rate (36,555) and the strong opposition to GM crops expressed for a wide variety of reasons, Government policy on GM was not seen to change as a result of this exercise. The response to this lack of movement by Government is cynicism and further erosion in the belief that the democratic process is working. In the event, market forces, brought about by the reaction of consumers to GM, not Government policy which are dictating whether GM maize or any other GM crop is cultivated in the UK.

Question 9

Is consultation fatigue an issue? Why is this and how could the issue be overcome?

The number of consultations coming from government departments and agencies is large. We are very selective in which consultations we respond to. As a rule these correspond to the ones which have most relevance to fulfilling our objectives.

GM Freeze believes that two changes would make a real difference to the need to respond to so many consultations on broadly the same policy area:

- There should be more consultation and involvement with individuals and organisations in the developing the basic principles of underlying Government policy and legislation. Crucially consultation should include agreement on what those basic principles mean to each side. For instance the precautionary principle and the polluter pay principle are supposed to be enshrined in EU law but are open to very different interpretations. Both are highly relevant in the case of GM crops and foods. In the case of policy on GM

contamination, the interpretation of “adventitious” in the legislation in relation to GM contamination is causing major policy disagreements between Government and civil society organisations. By agreeing a common understanding of what these key terms mean in practice at the time that policy was formulated, the need for in depth responses to consultations may well diminish. Often our comments on consultations relate to what we considered to be wrongful and unlawful interpretation of terms such as “adventitious” by the departments involved in policy formulation and who issued the consultation.

- There should be more obvious signs where policy and legislation have been changed as a result of consultations. Open acknowledgment of where changes have been made should be a standard part of feedback and consultations and referred to when ministers introduce White Papers or draft legislation. Fatigue can arise from a sense that responding to yet another consultation will be ignored and not change the Government’s original policy in any way. In our experience this is a common feeling amongst civil society groups and the public. However, in the case of very large public responses to consultations, it is possible that the impact can be more like a referendum result and at least stop Government embarking on a deeply unpopular policy or delay the decision or prompt further research.

Question 1

Has the Code of Practice improved the way in which government consults and to improved policy outcome?

GM Freeze believes there has been very little improvement in the quality of Government consultations or the policy outcomes as a result of the Code of Practice.

The Code does have the advantage of providing a clear framework for such exercises so that every department and agency should follow the same set of rules.

However the overwhelming feeling is that very little will change in terms of policy as a result of any comments from ourselves or our members and supporters.

Question 2

Are 12 weeks the right amount of time for a formal written element of Government consultation? Do you think there are circumstances where a longer or shorter duration may be more appropriate?

For most consultations, GM Freeze believes that 12 weeks is a sufficient period in which to respond. However, for some policy areas, where there is substantial cross over of issues, organisations may need to consult with members or other groups, the period should be extended up to 20 weeks.

The timing of consultations is also important especially if they fall over traditional holiday periods such as the school summer holidays and Christmas when colleagues may not be available for discussions. In addition, the summer recess of Parliament limits the opportunity for MPs to ask Parliamentary Questions regarding the consultation or to gain information pertinent to it. We would therefore recommend that at Christmas two weeks be automatically added to the standard 12 week period and for the summer holidays 6 weeks be added.

Timing of consultations about agricultural policy or decisions of the approval to test GM crops need to take into consideration the availability of farmers to participate during very periods of the year, for instance spring and autumn sowing, forage harvesting and crop harvesting. Again extending the period of consultation would increase the chances of farmers responding to consultations.

Question 3**Is the system for monitoring and promoting performance of departments in relation to the criteria in the current Code of Practice on Consultation right? What improvements could be made?**

GM Freeze notes that the consultation document suggests that the proportion of consultations lasting at least 12 weeks fell between 2005 and 2006 from 80% to an estimated 75%. This means in 2006 that one quarter of consultations were not meeting the requirement of the Code of Practice in their duration. We recommend that if the Government consultation process is to gain the respect of civil society organisations and members of the public, some independent Parliamentary oversight of performance is needed. The Public Administration Committee would be the most appropriate body to perform this task or a new Commons Committee specifically established to meet this need. The Cabinet Office should continue to compile information from other departments and agencies. Public complaints about the conduct of any consultation could be sent direct to the Committee who would be required to follow it up with the Cabinet office and/or the appropriate department. The Committee should have sufficient administrative back up to enable them to deal with volume of comments received within an acceptable period (we suggest 4 weeks).

Question 4**Is the Impact Assessment sufficient to improve public consultation on the evidence-base for Government policy-making? How could consultation policy improve consultation on Impact Assessment?**

GM Freeze believes that the current Impact Assessments should be more open and honest about the assumptions built into them and the reliability of the data used to assess the costs of implementation. In all cases, the Impact Assessment should always include an assessment of the cost of taking no action. Cost and benefits analysis is only as good as the data fed into the model. Often environmental and long-term impacts are difficult to quantify and this is particularly the case with GM crops. It is therefore essential that all consultations make it very clear when there are gaps in the data, uncertainty or where more data would help. In these circumstances, choosing to delay implementation until the full impact can be properly assessed should be choice clearly set out in the consultation document.

Question 7**How do you become aware of Government consultations and how would you like to learn about up and coming and current consultations?**

GM Freeze becomes aware of consultation in three main ways:

- Direct from the department or agency conducting the consultation.
- By looking at the appropriate sections on Government and Agency websites.
- Through word of mouth or email from other civil society groups.

In the future we would prefer to be emailed to a general email address. This process would be aided by the Government Departments identifying who the stakeholders are in each area of policy and legislation in advance to avoid people being sent consultation for which they have no interest.

Question 10

See general comments above

Response to the Three Options

Question 11

Do you think any of these options would make a good consultation policy? If so which option and what changes could be made to improve it?

GM Freeze believes that it is clear from the limited scope offered in the three options that the Cabinet Office lacks real commitment to improve the current consultation process. As we stated in our general remarks (above) there are many options for extending the reach of consultations, particularly to members of the public who often provide freshness and clarity to arcane policy discussion by asking common sense questions. Case Study 2 in the Consultation Document provides some information on the Swedish practices and highlights the need to involve interested parties in Committees of Inquiry at an early stage in policy development. This consultation document falls well short of this and does not even suggest piloting a similar scheme in the UK on selected policy areas. GM Freeze believes this would be a positive way forward.

Whilst having many faults, *GM Nation? The Public Debate* represented a brave and challenging departure from the traditional UK style of public engagement on policy development, yet the Cabinet Office document shows no signs that it has taken on any of the ideas or lessons learnt before, during and after the public debate. Once again this is an unfortunate omission and greatly reduces the value and credibility of the current exercise.

Option 1 Written consultation plus one other form of consultation

This option seems far too prescriptive and lacks flexibility. In many specialist areas, the stakeholders will be the only people capable of responding to the consultation in any coherent way. For consultations on broad policy options this suggestion is too narrow and misses out on providing many different types of event at which to engage with stakeholders and, crucially, members of the public.

This option would only be a marginal improvement on what we have at present.

Public engagement on policy and implementation is a specialist area of work. We recommend that the Cabinet Office consults with specialist academic and commercial companies as to what methods are available and which ones are best suited for particularly tasks.

Our experience of stakeholder meeting/workshops with Defra officials on GM policy is not a happy one. Usually it was clear that the officials present were not there to listen to our views but to defend Government policy – that the consultation was being held for form's sake. Most people from civil society organisations left saddened and none the wiser from these workshops.

GM Freeze also attended workshops on the implementation of the Environmental Liability Directive in York in March 2007 organised by Defra, which was also very unsatisfactory. Officials running the workshop appeared to have no idea of timetabling and providing opportunities for questions, supplementary questions and comments. The meeting over ran considerably and many people had to leave to catch public transport before there was an opportunity to ask questions.

This tells us that in addition to talking to the experts, the Cabinet Office should also consider a comprehensive training programme for officials on how to engage with members of the public and on how to plan and run a workshop or meeting. There is a very strong case for stakeholder meetings to be run by neutral specialists who have had no direct involvement in policy development in the area under discussion.

Option 2 Fast track procedures with a Code of Practice

GM Freeze cannot see any justification for fast tracking most of the Government consultation so they last less than 12 weeks in duration apart from in emergencies, such as urgent regulations to deal with stopping the spread of a disease outbreak or the contamination of food with GM pharmaceutical genes. Most legislation requiring a consultation can be anticipated long in advance to allow for the full 12 weeks or longer if it is a complex policy area. We would support a minimum period of 12 weeks. For shorter consultations to deal with emergencies, Ministers should make an application to the Cabinet Office with their justifications for their request. The involvement of a select Committee, as we proposed earlier, should prevent frivolous use of the shorter consultation for political reasons or bureaucratic expedience. The Cabinet Office should develop criteria of assessing such requests in consultation with the public and make those known to all departments and the public/stakeholders.

Option 3 Core Principles Approach

GM Freeze believes this option is the most attractive of the three on offer. However, it is conservative in outlook and will not truly open up new and democratic ways to involve the public in decision making. We speculate that cost is at the heart of the Cabinet Office's reluctance (see Cons in paragraph 5.27) to explore all the options available and employ them as appropriate to meet the demands of each consultation.

Opening up the consultation process at the earliest possible stage (as appears to be the case in Sweden in Case Study 2) could be a significant step in restoring faith in the process and help make Governance more democratic.

Democracy is not cheap, but by opening up the consultation process to a far wider section of the community the Government would help to build public support for policy or legislation at community level. It may also prevent costly and ill judged policies and legislation from being adopted and therefore save money in the long term.

Conclusions

GM Freeze welcomes the Cabinet Office consultation on *Effective Consultation*. However, we feel the document is in great danger of missing a real opportunity to improve Government engagement with individuals and civil society organisations to enable them develop policy and legislation alongside government. The Document is too timid in what it proposes. Making consultations more accessible and inviting will require expert input from outside Government circles, training staff and additional money. The reward could be better policies and legislation which commands wide respect amongst the public.