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HEALTH AND SAFETY EXECUTIVE

Senior Management Team

Strategic Plan for International Engagement in 2009/10

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Issue

1. Report on international engagement in 2008/09 and approval of a further high-level plan for international engagement in 2009/10.

Timing

2. Routine.

Recommendation

3. That the SMT notes the successful delivery of last year's plan and approves this year's plan (at annex 2).

Background

4. In discussion of paper B/07/113 on international engagement in November 2007, the SMT (as the then Board) asked that a high-level plan for international engagement be developed each year for approval. This paper reports on the delivery of the 2008/09 engagement plan and presents a further plan for approval.
5. The SMT will recall that the Board has shown considerable interest in international affairs and that we are now providing it with monthly updates on European business by means of the Chief Executive's monthly report.

Argument*Report on 2008/09*

6. A copy of last year's plan and a report are at **annex 1**. The key messages are that:
 - We engaged successfully on all our key EU dossiers. Outcomes are noted in annex 1.
 - Senior managers completed a useful series of international visits in the EU and further afield.
 - We engaged successfully with our target people and organisations, though it is still too soon to know what benefits may ensue.

- We have relatively little to show for our efforts on corporate learning from other countries.
7. This is a broadly positive story. The strategy has focused our activity where it is most needed and has helped prioritise work in HSE. It is not immediately clear why we have not been as successful as we may have wished on learning from others. Nevertheless, it is proposed that we continue this effort for 2009/10 (removing migrant workers, which is no longer as pressing), and re-emphasise the importance of the need for corporate learning through further internal communications activity. We propose to target our attendance at international conferences to cover our learning areas, especially occupational health.

Proposals for 2009/10

8. A further plan for 2009/10 (**annex 2**) has been devised in consultation with SMT members, staff and OGDs, following the pattern from last year. There are few changes of significance, other than:
- (a) Refreshing the **key dossiers** and international engagements;
 - (b) Emphasising the importance of **inward visits** to HSE. If we are to be recognised as a world leader, we need to accept that we have a responsibility to help countries with less well-developed regulatory systems. Visits can play an important part in discharging that responsibility; and
 - (c) A stronger emphasis this year on engaging more effectively with the **European Parliament**, particularly following the elections this summer when there could be as many as half of the members new to Strasbourg.

A specific rationale and approach for this latter activity is at **annex 3**, but essentially the European Parliament is becoming an increasingly important player in the conduct of EU business. This is especially relevant for HSE as EU legislation on occupational safety and health is nearly all co-decided. HSE currently engages with the EP on a case-by-case basis, primarily by providing written briefing on specific dossiers but with little face-to-face activity, meaning that engagement normally ends when a dossier is completed. This means that relationships with MEPs are not sustained. We need to reach a state where engagement with the EP becomes a routine matter for policy teams active on EU work, and we have productive relationships with MEPs. To minimise the additional burden on teams, it seems sensible for the responsibility for developing sustained relationships to fall on international unit staff, the grade 3 and 5 policy leads on cross-cutting international matters and the Chief and Deputy Chief Executives. This activity will begin following the elections in summer 2009.

Engagement with the Board

9. The SMT is invited to comment on the extent to which this engagement strategy should be shared with the Board. The Chair and Board members may be useful advocates for HSE in international affairs. However, the need for and extent of their engagement in any particular subject should be decided by those with the policy lead. Board level involvement in any cross-cutting international issues will be the responsibility of international unit.

Consultation

10. Internally and with DWP, BERR, Defra and UKRep.

Presentation

11. Our key messages are that HSE seeks to be recognised as one of the world leaders in health and safety. Our record is good, but we know that there are areas where we can improve and we are determined to learn from others. In Europe, we are committed to working constructively with our partners to enable workplaces to be safe and healthy and so contribute to a prosperous Europe for all.
12. We will look for and, where appropriate, make opportunities to establish and reinforce this position, especially through third-party endorsement.

Financial/Resource Implications for HSE

13. The annual full staff cost¹ (in policy group) for work on HSE's current EU dossiers is estimated at around £2.1m and this will be met from the existing budget allocation. This is based on the assumption that for those involved, EU work constitutes most of their activity. It is anticipated that costs will remain at about the same level for the rest of the SR 2007 period. These costs are affordable within the current Policy Group indicative allocations for 2009/10 and 2010/11.
14. Additional lobbying of the European Parliament will entail a small number of additional visits to Brussels or Strasbourg. Opportunities will be taken to brief MEPs collectively, thus reducing the financial impact, but it is estimated that this additional work will cost around £10,000 (based on around 6 extra visits, together with additional work for preparing the briefings). This is unfunded and will be accommodated by slowing down other international work in the relevant teams such as preparing routine briefings and updates to the HSE website.
15. The benefits of better international political engagement will not be realised immediately. It should make us more influential with our partners in other member states, which should lead to better outcomes for the UK. However, these benefits cannot be quantified.

Environmental implications

16. There will be an additional impact on the environment from the small number of additional visits proposed. Wherever practical, lower carbon emission methods of transport such as Eurostar are preferred.

Action

17. If the SMT approves the plan, international unit will implement and monitor it, reporting back in spring 2010 together with a follow-on plan.
18. If SMT considers that the Board should be informed about this plan, it is requested to give its views about how much of the plan should be shared. For example, perhaps we could include last year's report and a summary of this year's plan (i.e. just annex 1 and annex 2 abbreviated to remove detail).

¹ This excludes travel and subsistence costs of about £500k each year, of which 10% is recovered from the European Commission or other bodies.

	Strategic Plan for International Engagement 2008/09	Report
1.	Key business	
	The main items of international business that are on the horizon and which will need careful management are:	
	Substantive amendment to the EMF directive. (SCS responsible: Les Philpott)	The EC has commissioned an impact study to inform its impact assessment. The deadline of April 2012 for a new directive appears to be challenging.
	Needlestick infections. Likely to proceed to proposal for directive to amend the Biological Agents Directive. Risk does not justify the measure. (Les Philpott)	The social partners informed the European Commission (EC) in autumn 2008 that they are willing to negotiate a social partners' agreement on this issue. Work on a directive has been suspended pending the outcome of these negotiations.
	Amendments to the Seveso Directive. The Commission has started a review of the directive and is expected to put proposals forward in late 2009. Nevertheless, we need to be influencing effectively now. (Les Philpott)	An EC technical working group is looking at the implications of adopting the globally harmonised classification criteria for the Seveso directive. A proposal is not now expected until early 2010.
	Musculoskeletal disorders – possible directive. Also risks opening the way for legislation on stress. (Peter Brown)	The EC commissioned an impact study which reported in late 2008. The EC favours a directive that would combine the existing manual handling and DSE directives and address other physical risks too, but probably not psychosocial risks. A proposal is likely to emerge in late 2009.
	Carcinogens and mutagens directive amendment. Likely to expand scope to include reprotoxins and to introduce new procedures for assigning exposure limits to carcinogens and mutagens. (Steve Coldrick)	The EC has decided not to include reprotoxins in the carcinogens and mutagens directive. It has commissioned an impact study to help decide the next steps.
	Global harmonisation of classification etc of chemicals. This has wide implications and it is essential that we maintain influence at the UN to manage the impact. (Steve Coldrick)	A first-reading deal (in which UK officials played a leading role) was secured for the 'CLP' regulation which adopts the globally harmonised classification etc for chemicals.

	<p>Support BERR in activities to:</p> <ul style="list-style-type: none"> • persuade the European Commission (DG Enterprise) that controls on chemicals should reflect both hazard and risk, and not just hazard. (Steve Coldrick) • review 'new approach' legislation. It is vital to retain a risk-based approach. (Liz Gibby/Marcia Davies) 	<ul style="list-style-type: none"> • The European Commission is well aware of the issue and the advent of REACH should help. Specifically, good progress is being made on incorporating potency (a surrogate for risk) into the classification of mixtures as toxic for reproduction. • The legislative outcome is now called the 'New Legislative Framework' and includes non-New Approach legislation such as REACH. The legislation applies directly to Member States and takes a risk-based approach. The Regulation requires the UK to submit its market surveillance programme to the Commission by January 2010. A Market Surveillance Coordination Committee has been set up to advise BERR on strategic issues, on which HSE is represented.
	<p>Continue to monitor European Commission desire for competence in nuclear safety, security and radioactive waste management. (Mike Weightman)</p>	<p>A proposal for a Council Directive on nuclear safety was adopted by the Commission on 26 November 2008. HSE is supporting DECC in negotiations in the Atomic Questions Working Group.</p>
2.	<p>Events to be attended by Board (now SMT) members</p>	
	<p>These events support our aim to be recognised as a world leader in health and safety.</p>	
	<p>EU Senior Labour Inspectors' Committee meetings (Sandra Caldwell)</p>	<p>Meetings were held in Ljubljana and Lyon during the Slovenian and French Presidencies.</p>

<p>International Association of Labour Inspectors (Kevin Myers, vice-president):</p> <ul style="list-style-type: none"> • Annual conference in March 2008 (Adelaide, South Australia) • Triennial Congress and General Assembly in June 2008 (Geneva) 	<ul style="list-style-type: none"> • The Australian conference <i>Towards Healthy, Safe and Decent Work through Alliances, Ethics and Influence</i> was very well organised and attended. It acted as a springboard to set up two 'regional' networks of communications and mutual support (Pacific Region and SE Asia Region). It also had workshops within the to further develop IALI's work on producing a Global Code of Ethics for labour inspectors. • The Congress and General Assembly endorsed the Global Code of Ethics, elected a new Executive Committee (including Kevin Myers from HSE) and agreed a three year strategic work programme for 2009-2012.
<p>Meetings on the Nuclear Safety Convention (2008) and the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (2009) (Mike Weightman)</p>	<p>Participation in, and contribution to, EU meetings, in particular the High Level Group (HLG) of senior regulators, are considered to be influential in establishing consensus on nuclear safety issues within the EU. Where issues of interest have arisen these have been discussed with OGDs and internally.</p>
<p>European High Level Group on Nuclear Safety (Mike Weightman, vice-chair)</p>	
<p>World Congress on OSH, Korea, July 2008 (Jane Willis).</p>	<p>Jane Willis gave a well-received presentation on the FIT3 programme. Her view was that HSE should ensure that we attend sufficient of these World Congresses to maintain our standing with other countries.</p>
<p>France holds the EU Presidency in the second half of 2008. They plan at least one conference and may organise a meeting of health and safety directors-general, which Geoffrey Podger may wish to attend.</p>	<p>Sandra Caldwell and Dermot Breen (HSENI) attended the DGs' meeting for the UK, owing to Geoffrey Podger's absence on leave. Four HSE staff attended the Presidency conference in November, including one as a speaker.</p>

3.	Learning from others	
	Topics for HSE staff to gather intelligence on and feed to relevant policy teams:	
	Nuclear safety – from most nuclear countries, but the USA, Canada, France and other major nuclear countries are the priority	We have maintained our existing good relationships with regulators in France and other countries.
	Occupational health systems – the Scandinavian countries, the USA, Canada and Australia	Engagement has mainly been on psychosocial issues. There were two European workshops on stress – one was the French EU presidency conference and one as part of a cross-EU working group. There was also a visit to Australia which focussed on enforcement of stress and a visit to the USA on psychosocial themes. Outcomes – confirmation of UK lead internationally on the development of practical tools for managing occupationally-related stress. Learning about some interesting and helpful indicators for assessment of national approaches to psychosocial risk assessment at a national/macro level. Also, though, confirmation of the real difficulties of devising any viable approaches to enforcement in the psychosocial area.
	Migrant workers – all countries that have a significant migrant population	Contacts were made with policy officials dealing with migrant workers during the Chief Executive’s visits to Ireland and the Netherlands.
	Stimulating director leadership and worker involvement – the Anglophone world	Contacts were made with policy officials dealing with these subjects during the Chief Executive’s visits to Ireland and the Netherlands.
	Agriculture – all countries. Initial contact through ISSA.	This work has been progressed with other countries in Europe (e.g. Italy) and further afield (e.g. Canada). In addition, HSE has agreed to provide an expert for an ILO working group preparing a code of practice on safety and health in agriculture.

	Inward visits to HSE	International unit recorded 41 requests for visits to HSE from March 2008 to February 2009 ² , including those from an Italian Parliamentary Delegation; the Minister for Labour, Barbados; the Deputy Minister of Labour, Province of Ontario; the Director General of the Work Environment Authority, Sweden; and the Chief Executive of the Health and Safety Authority, Ireland. Some visits may also have been arranged directly with HSE teams.
4.	People/stakeholders to engage	
	Depending on how the dossiers in part one develop, SCS staff and Board members may need to meet their counterparts in the Commission and like-minded Member States to ensure effective lobbying for UK interests.	
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5.	Significant activity that was not specifically included in the 2008/09 plan	
	Nuclear Directorate	HSE attaches very great importance to the sharing of international knowledge and experience and our contribution to the continuous improvement of nuclear safety and security worldwide. It also supports other government departments in this aim. In the period April to December 2008, ND staff recorded 773 staff days visiting abroad. This was distributed between the development of safety standards (particularly IAEA and

² Countries who made requests were: Australia (several states), Barbados, Canada (Ontario), China (and Hong Kong), Croatia, Czech Republic, Estonia, France, Iran, Ireland, Israel, Japan, Malaysia, Malta, New Zealand, Nigeria, Norway, Qatar, Saudi Arabia, Singapore, Slovakia, South Korea, Sweden, Turkey and USA. Only about half of the requests were met. Several initial requests were not pursued by the requester, were cancelled or postponed. In several cases, the requester's needs were able to be met by referring them to HSE's website.

		<p>OECD/NEA); participation in international conventions (in support of government departments); meetings at senior regulator level (e.g. INRA and WENRA); participation in EU/EC meetings (HLG and RAMG); bilateral discussions with other regulatory bodies (in particular USA, France and Finland on new build issues); security issues; and conferences and seminars.</p> <p>This work supports ND's aims and objectives and enables ND, on behalf of the UK, to learn from and influence other national regulatory bodies.</p>
	Pesticides Safety Directorate	<p>Council and European Parliament negotiations on two major pieces of pesticide legislation were undertaken in 2008/09 (the Pesticide Authorisations Regulation and the Framework Directive on the Sustainable Use of Pesticides).</p> <p>With the conclusion of these negotiations likely in May/June 2009, the new Chemicals Regulation Directorate will be turning its attention to developing an implementation programme for these two pieces of legislation. This programme is likely to consume a sizeable portion of Defra-funded staff resource working on pesticides over the next two years. There will continue to be input to EU legislation on statistics and machinery.</p>

Health and Safety Executive Strategic Plan for International Engagement 2009/10

1. Key business

The main items of international business that are on the horizon and which will need careful management are:

- Substantive amendment to the **EMF** directive. (SCS responsible: Les Philpott)
- Amendments to the **Seveso** directive. The Commission has started a review of the directive and is expected to put proposals forward in 2010. (Les Philpott)
- Proposal for recast of the basic **[radiological] safety** standards directive likely to be presented late 2009/early 2010. (Les Philpott)
- **Musculoskeletal disorders** – likely directive (billed as a simplification initiative, but likely to include additional provisions) in late 2009/early 2010. (Peter Brown)
- **Carcinogens and mutagens** directive amendment. Likely to introduce new procedures for assigning exposure limits to carcinogens and mutagens. (Steve Coldrick)
- **Biocidal products** directive – proposal for substantial revision likely to be submitted to the Council and EP early in 2009. (Steve Coldrick)
- **Pesticides** regulation and directive due to be agreed in Council in May/June 2009. Many optional elements and uncertainties have still to be resolved. Development of the remaining elements of the thematic strategy for pesticides will require extensive engagement with Commission and other Member States to promote UK interests. (Dave Bench)
- Continue to monitor European Commission desire for competence in nuclear safety, security and radioactive waste management. In particular, we need to support DECC in influencing the development of the proposed **nuclear safety** directive. (Mike Weightman)

2. Events to be attended by SMT members

These events support our aim to be recognised as a world leader in health and safety.

- EU Senior Labour Inspectors' Committee meetings (David Ashton)
 - May 2009 (Prague, Czech Republic; one day to be devoted to accident prevention)
 - November 2009 (Stockholm, Sweden; one day to be devoted to psychosocial issues)
- International Association of Labour Inspectors (Kevin Myers, vice-president)
 - April 2009 (Lisbon, Portugal)
- Meeting on the Joint Convention on the Safety of Spent Fuel Management and on the Safety of Radioactive Waste Management (Mike Weightman)
- European Nuclear Safety Regulator Group (ENSREG), formally (under the relevant Commission Decision) the High Level Group on Nuclear Safety and Waste Management (Mike Weightman, vice-chair)
- IAEA Senior Regulators Meeting on 'Effective Nuclear Regulatory Systems', December 2009 (Mike Weightman)

3. Learning from others

These are related to the Board's strategy for health and safety. Topics for HSE staff to **gather intelligence** on and feed to relevant policy teams:

- Nuclear safety – from most nuclear countries, but the USA, Canada, France and other major nuclear countries are the priority
- Occupational health systems – the Scandinavian countries, the USA, Canada and Australia
- Stimulating director leadership and worker involvement – the Anglophone world
- Agriculture – all countries.

In addition, we should target our attendance at international **conferences** to focus on these learning topics and especially occupational health.

HSE should continue to use the **visits** requested by people in other countries to gather information. It is likely that there will be less opportunity to discuss the topics above, as people generally visit to discuss specific subjects, quite often in technical depth. We will look more favourably on requests for visits where there is a clear opportunity for mutual learning, rather than it being a wholly one-way process. Nevertheless, we recognise that in striving to be a world leader in health and safety, we have a responsibility to share our experience with countries that have less well developed health and safety regulatory systems.

4. People/stakeholders to engage

Depending on how the dossiers in part one develop, SCS staff and Board members may need to meet their counterparts in the Commission and like-minded Member States to ensure effective lobbying for UK interests.



HSE – International Unit
March 2009

Strategy for Engagement with the European Parliament

High Level Objective

1. A long-term strategic relationship is built up with the European Parliament (EP) on European occupational safety and health (OSH) and this is used to effectively defend and promote UK national interests in the EP.

Current situation

2. The European Parliament is becoming an increasingly important player in the conduct of European Union (EU) business. There are a number of reasons for this:
 - Around 80% of EU Legislation is co-decided by the EP. This number will rise if the Lisbon Treaty comes into force;
 - The EP exerts considerable influence over the European Commission (through scrutinising the work of Commissioners, and having powers of budgetary approval and to dismiss the Commission);
 - The EP is the second most lobbied institution in the world (after the United States Congress).
3. The UK's reputation for effective EP lobbying is strong, however since October 2007, there has been a drop in UK engagement with the EP and to counter this, Government Departments have been asked to refocus and reenergise their relations with MEPs. This is especially pertinent for the Health and Safety Executive (HSE) as EU legislation on occupational safety and health (OSH) is nearly all co-decided (the exception being aspects covered under EURATOM Treaty as consultation with the EP) and therefore effective engagement with MEPs is essential to ensure UK interests protected in the Council are not undone by the EP. Also with an EU of 27 Member States, the UK is not the only country trying to exert influence with EP; France and Germany are already having a significant impact.
4. **HSE currently engages with the EP on a case by case basis, primarily by providing written briefing on specific dossiers but with little face to face activity, meaning that engagement normally ends when a dossier is completed. This means that relationships with MEPs are not sustained, leaving others to build influence with MEPs in our absence and which we will have to battle against when UK health and safety interests are at stake, and HSE's profile remains below the radar within the EP as we will be an organisation that MEPs will only come across intermittently when OSH legislation is going through.**

Options for change

We have considered only two principal options. There are of course variations on a theme, but these are the two options at the extremes of the spectrum of possible interventions.

No change: maintain the status quo

5. HSE continues to take an *ad hoc* approach in its relationship with the EP, i.e. engagement is restricted to the lifetime of each individual dossier or to one off instances where engagement with the EP is critical to securing UK national interests. HSE therefore has to constantly re-engage with MEPs each time a dossier is going through the co-decision process as we have no long term relationships in place to utilise for support and guidance, and without ongoing engagement we lack the ability to monitor and influence the EP's thinking on EU OSH – meaning HSE will always be reacting to the EPs' agenda, with the inevitable consequence that lack of influence will lead to initiatives that are not always be favourable to UK national interests in OSH.

Develop a longer-term strategic relationship with the EP

6. HSE takes a more planned approach in its relationship with the EP – targeting and building long-term relationships with key MEPs, not necessarily just UK representatives, and EP officials as a source of intelligence on OSH dossiers/initiatives coming before the EP. This would mean we would have the opportunity to try to shape MEPs' thinking at an early stage, before positions are formed, and crucially as a means to influence the development of EU OSH legislation in a manner favourable to the UK through the EP's legislative stages. This course of action would enable HSE to contribute towards the wider UK objective of maintaining levels of influence within the EP commensurate with those of France and Germany, the member states with most influence within the institution.

Reasoned choice

7. To continue with the status quo would leave HSE at a disadvantage when acting on behalf of the UK to influence legislative dossiers in the EP, especially as we would be battling for influence against Member States with more established networks with the EP and other non-governmental organisations that already have significant networks in the EP. HSE therefore needs to adopt option 2 and take steps to develop a longer-term more strategic relationship with key influencers in the EP to ensure that the UK exerts comparable levels of influence in the EP on OSH dossiers as other significant Member States are already able to do, and which should also lead to UK MEPs recognising HSE as an organisation who they can look to for authoritative advice and guidance in this area.

Success criteria

8. Engagement with the EP becomes a routine matter for policy teams active on EU work (i.e. influencing the EP will be a standard part of engagement strategies). HSE will have developed and be able to use networks in the EP to defend and promote UK health and safety interests.

Action Plan

2009 EP Elections

9. The last plenary of the current EP will be in early May 2009. The elections will be in June 2009, with the expectation that business will not start in the EP until at least October. HSE should therefore be prepared to engage with the new EP after that date.

Building good relations with UK link MEPs

10. UK link MEPs provide an invaluable source of information and advice to Government Departments on what is happening inside the EP on specific dossiers and wider political thinking. HSE needs to build strong relationships with UK link MEPs, across the political parties, and maintain regular contact with them to use their advice and expertise effectively. In some cases, some UK Conservative MEPs may have views closer to those of the UK Government than some UK Labour MEPs, so relations across political groups are essential if the UK is to deliver its OSH objectives. The task of building and maintaining enduring relationships with MEPs and their researchers falls naturally to the international unit. This will also reduce the burden on individual policy teams.

International Unit:

- To organise in cooperation with UKRep at least one briefing meeting in Brussels for interested MEPs and their researchers on health and safety generally after the EP elections and at the start of each new EU Presidency thereafter.
- To provide and maintain a central point of contact for UK link MEPs on OSH matters.
- To develop a good working relationship with relevant MEPs on a cross-cutting basis.

Policy Teams:

- To develop and maintain links with UK link MEPs on specific dossiers, including seeking opportunities to brief MEPs in person where appropriate, both generally on a subject and on specific dossiers.

Getting to know the Committees

11. Most of the dossiers that HSE has an interest in are allocated to the Employment and Social Affairs (EMPL) Committee or the Environment, Public Health and Food Safety (ENVI) Committee. The committees are the business end of the EP, so HSE needs to maximise its impact there to deliver UK objectives, in particular by engaging effectively with key committee members.

International Unit:

Policy Teams:

- To develop and maintain relationships with:
 - Committee Chair
 - Committee Vice-Chair
 - Key staff on the Committee secretariat

Policy Teams:

- To develop and maintain relationships with:
 - Rapporteurs and shadow rapporteurs (these will only be known once a dossier has been allocated to a committee)

12. Most of these positions will not be occupied by UK MEPs. International Unit will contact Committee UK link MEPs to see if they can help to establish contact. Consideration should also be given as whether visits by Ministers and Senior Officials would help in establishing relationships.

Visits to EP

13. Written briefing, though essential, is no substitute for personal contact. Officials should seek well-timed visits to Brussels to see MEPs about their dossiers, in particular the Committee Chair and Rapporteur for their dossier and UK link MEPs. Officials should also consider if a visit by Senior Officials or Ministers to the EP is needed. MEPs may be more likely to help the UK if they feel Ministers have taken the time to engage with them.

Other approaches

14. As well as conventional lobbying, as described above, officials should also consider other methods to get UK views across to MEPs. Ideas include:

- Seminars and briefing sessions;
- Getting allies in other Member States to lobby their MEPs (could also be reinforced through the action from our embassies);
- Ministerial 'phone calls at crucial times;
- Using NGOs, as these can be particularly effective at conveying a message that, if it came from a governmental organisation, would be either ignored or rejected.