

Courts and the Making of Public Policy

Access to Environmental Justice in England and Wales

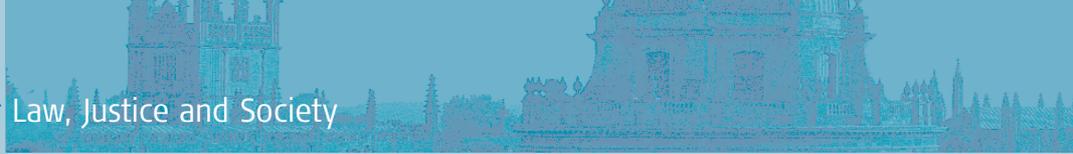
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Executive Summary

- Access to environmental justice concerns the ability of concerned citizens and civil society groups to: access the courts and legal advice at reasonable cost; be provided with a fair venue for the treatment of environmental issues; and secure adequate and effective remedies (including injunctions) for environmental offences (Castle, Day, Hatton & Stookes, 2003).
- In England and Wales there has been a slow broadening of access to justice, particularly to nongovernmental organizations (NGOs) in the area of environmental law. However, significant barriers to accessing the courts remain.
- Until the 1980s, British citizens wishing to litigate against the government were required to show that they had 'suffered a special injury apart from the general populace', which made NGO public-interest litigation especially difficult. This changed with *Fleet Street Casuals* [1982], when the House of Lords interpreted *locus standi* more liberally, encouraging those bringing valid complaints in the public interest.
- The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters (known as 'the Aarhus Convention') represents a novel type of environmental agreement in its rights-based approach and its focus on procedural as well as substantive rights. It is also unique in its reflection of the distinctive role of citizen groups and NGOs in enforcing environmental law. The Aarhus Convention has the potential to significantly improve the participation of citizens and NGOs in ensuring effective enforcement of environmental law.
- Perhaps the most significant hurdle in accessing justice for citizens and NGOs in England and Wales are the costs and risks associated with participating in legal activity. In the 'loser-pays' fees-system the cost of legal action also includes the potential exposure to the risk of paying the other party's costs should the claimant's legal action fail.
- The introduction of Protective Cost Orders (PCOs) by the Court of Appeal has changed this picture to a limited degree. PCOs were developed to ensure that challenges to decisions of public bodies which need to be resolved in the public interest are not stifled by the threat that an unsuccessful claimant will have to bear the other side's legal costs.
- The situation in Scotland is markedly different from that in England and Wales and more attention should be paid by policymakers to these differences. Rules on standing ('title and interest') to take judicial review are applied more restrictively than in England and Wales. Rules on Protective Expenses Orders and the policies of the legal aid system in Scotland virtually prohibit the taking of environmental cases. Whereas on many counts, such as time limits and the right to appeal, the Scottish legal system is more open, the initial barriers a citizen faces in accessing justice are problematic for the UK in fulfilling its obligations under the Aarhus Convention.
- Access to justice matters for democracy. Unless citizens and groups are able to go to court on an equal footing with well-resourced governments and corporations to challenge the legality of decisions made by public authorities, then unlawful decisions will not be identified and overturned. Environmental law, like all law, has little purpose if it is not upheld. The environment cannot defend its own (legal) interests, yet its protection is in the interest of all citizens.

Access to Environmental Justice in England and Wales

Introduction

Originally published in 1972, *Should Trees Have Standing?* by Christopher Stone served as a rallying cry for the then budding environmental movement in the United States. It launched a debate regarding the legal rights of trees, oceans, animals, and the environment. In following the logic of Stone's treatise that the environment cannot defend its own interests, nongovernmental organizations (NGOs) have stepped into the courtroom in order to ensure enforcement of environmental law. This is important because unless citizens and civil society are able to go to court to challenge the legality of decisions made by public authorities, unlawful decisions will remain in place.

However, this use of the law by environmental activists is not without its controversies. By its critics, legal mobilization efforts empower 'nondemocratic' NGOs and 'unaccountable' judges at the expense of majoritarian institutions, such as legislatures, thus undermining democracy. By its proponents, the use of strategic litigation is an important way for engaged civil society actors to influence public policy and participate in governance. They see the role of NGOs as two-fold: first, protecting the (legal) interests of the 'voiceless elements in nature', and second, advocating for changes to a system that they see as inherently biased towards the interests of business and developers to ensure that access to environmental justice is affordable, fair, and effective. As numerous studies have now asserted, the existence of a court does not automatically translate into effective and equitable access to justice. Marc Galanter (1974), in his study of the resource capacities of parties to litigation, found that the 'haves' tend to come out ahead. According to Charles Epp (1998), it is not merely an awareness of rights and a willing and able judiciary that lays the foundation for effective rights enforcement. Rather, 'material support for sustained pursuit of rights is still

crucial' (17). In most cases, pursuing a legal campaign is a lengthy, costly, and risky process. Actors with strong organizational and resource capacities stand a better chance of successfully exploiting legal opportunities (Börzel, 2006).

An issue that environmental NGOs in England and Scotland have campaigned on, both separately and together, is that of access to environmental justice. In the realm of environmental policy, access to justice refers to the ability of concerned citizens and social movement groups to: access the courts and legal advice at reasonable cost; be provided with a fair and equitable platform for the treatment of environmental issues; and obtain adequate and effective remedies (including injunctive relief) for environmental offences (Castle, Day, Hatton, & Stookes, 2003: 23).

Over the twenty-year period examined here there has been a slow broadening of access to justice, particularly to NGOs in the area of environmental law. However, significant barriers to accessing the courts remain. Issues of interest group standing, the judiciary's knowledge of environmental issues, limited availability of legal aid for public interest litigation, and particularly the continuing problems associated with the fee-structure and associated high risk of incurring costs severely limit the ability of citizens and groups to bring meritorious claims.

The legal basis for accessing environmental justice

This policy brief narrowly focuses on the use of strategic litigation through the use of judicial reviews by NGOs.¹ In the United Kingdom, judicial review

1. Other types of environmental legal actions taken by the NGOs discussed here include third-party interventions, statutory nuisance cases under criminal law, responses to property damage claims, and human rights claims.

refers to a type of legal action in which a judge assesses the lawfulness of a decision or action made by a public body. Judicial reviews are a challenge to the way in which a decision has been made, rather than the conclusions reached. Generally, the courts' jurisdiction covers:

- applications to prevent a public authority acting unlawfully;
- applications to require a public authority to act lawfully;
- applications to quash an invalid act;
- applications for declarations as to what is the proper legal regime and rules applying to a particular case;
- applications for injunctive relief;
- and applications for costs associated with a substantive claim.

In England, applying for judicial review is generally a two-stage process. The first involves applying for permission to seek judicial review. This is the stage where challenges such as whether the applicant has 'sufficient interest' in the issues at hand are made. If permission is granted, the substantive and factual merits of the case are considered in the second stage. More recently these two stages have been combined, particularly in complicated cases.

As Paul Stookes (2008) has highlighted, the reliance that citizens and groups place upon judicial review can have significant limitations. First, judicial reviews are widely considered by the judiciary as a remedy of last resort and can only be relied on after all other channels have been exhausted. Second, a judicial review does not address the merits of the decision, only the process undertaken by public decision makers. This has particular implications in the case of environmental law, where often the scientific complexity of the issues is completely ignored.

Domestic and European Community environmental legislation

In the UK, environmental law-making and enforcement is carried out by a patchwork of local and central government bodies and agencies. This includes local councils, the Environment Agency; the Department for Environment, Food and Rural Affairs; and the Department of Energy and Climate Change. Environmental law of this type consists of both procedural rights, such as the rights of access to information embodied in the Environmental Information Regulations 2004, and substantive law, for example the Climate Change Act 2008.

In addition to domestically developed environmental regulation, the supremacy of an ever-growing body of EU environmental law represents an important source of environmental law. The most progressive and extensive environmental legal frameworks emanate from the European Union. Extensive EU legislation on conservation, chemicals, waste, air quality, water quality and acidification, genetically modified organisms, and energy has been incorporated into UK law.

International law: the Aarhus Convention

There have been important international developments concerning access to environmental justice in recent years. The United Nations Economic Commission for Europe (UNECE) Convention on Access to Information, Public Participation in Decision-making and Access to Justice in Environmental Matters was adopted on 25 June 1998. Known as 'the Aarhus Convention' after the Danish city in which it was adopted, the Convention represents a novel type of environmental agreement in its rights-based approach and its focus on procedural as well as substantive rights. It is also unique in its reflection of the distinctive role of citizen groups and NGOs in enforcing environmental law.

In linking environmental issues and human rights the Aarhus Convention promotes the notion put forth by some political theorists that environmental rights must include procedural measures in addition to substantive rights. In doing so, it links government

accountability and environmental protection and focuses on interactions between people and public authorities in a democratic context. The Aarhus Convention grants the public rights, and imposes on governments obligations, regarding access to information, public participation, and access to justice. The third pillar of the Aarhus Convention, of particular focus here, concerns access to environmental justice. It grants rights to members of the public, including environmental organizations, to challenge the legality of decisions by public authorities that are contrary to the provisions of national laws relating to the environment. Article 9(4) of the Convention requires that procedures for rights to access must 'provide adequate and effective remedies, including injunctive relief as appropriate and be fair, equitable, timely and not prohibitively expensive'. In short, the Convention is not only an environmental agreement, it is also a Convention about government accountability, transparency, and responsiveness.

The UK ratified the Aarhus Convention on 24 February 2005 and became a full party to the Convention ninety days after this date. The EU also ratified the Convention and has been a party to the Aarhus Convention since 18 May 2005. Until recently the UK government was largely relying on existing judicial review procedures to fulfill the access to justice requirements of the Convention.

Standing rules: who can access justice?

Rules governing standing to sue are a crucial dimension of accessing justice. Put simply, rules which govern standing to sue dictate who can legally take court action and who cannot. Standing rules are regulated, generally on a sector-by-sector basis, through legislation and precedential judicial rulings. In the UK, traditionally, status to sue required proving the merit of an existing 'case or controversy' (Cichowski & Stone Sweet, 2003). Until the 1980s, British citizens wishing to litigate against the government were required to show that they had 'suffered a special injury apart from the general populace', thus making NGO public-interest litigation especially difficult. This changed with the *Fleet Street Casuals* case in 1982. In this case, the House of Lords interpreted *locus standi*

more liberally, encouraging those bringing valid complaints. Subsequent legal mobilization by the environmental movement built on this precedent to further liberalize standing doctrine, making the courts more accessible to groups with valid legal claims. Paradoxically, many of these early cases were losses on the substantive issues brought before the court, but resulted in an important shift in levels of access to justice.

In *Greenpeace Ltd. v HM Inspectorate of Pollution No.2* [1993] before the Court of Appeal in 1993, Greenpeace unsuccessfully challenged a nuclear licensing decision. The judge considered the question of *locus standi* as a separate issue. Otton J said that Greenpeace is 'a responsible and respected body with a genuine concern for the environment'. However, he concluded that Greenpeace's *bona fide* interest in the activities carried out by BNFL at Sellafield lay in the fact that 2500 out of 400,000 supporters of Greenpeace resided in Cumbria where the thermal-oxide processing plant was situated. As Leonor Moral Soriano (2001) points out, Greenpeace was considered here to have judicial standing because it represented *individual* interests. Despite his maintenance of the individual aspect required for standing, Otton J suggested that the benefits of allowing access to environmental organizations included 'sparing scarce court resources, ensuring an expedited substantive hearing and an early result'.

The trend of liberalizing standing was continued in *R v Secretary of State for Trade and Industry, ex parte Greenpeace Ltd.* [1999]. In this case Greenpeace applied for permission to seek judicial review against decisions taken by the Secretary of State for Trade and Industry, which had granted permission to a number of oil companies to search for and extract petroleum in areas within the UK continental shelf but outside the territorial waters. The areas contained a species of coral claimed to be protected under the European Habitats Directive. In this case, Greenpeace's *locus standi* was not contested. In particular, Laws J considered 'the important fact that the applicants' *locus standi* to sue is as a public interest plaintiff; they have no private axe, economic or otherwise, to grind'.

This series of cases, mainly losses for the NGOs on the substantive issues, nonetheless were particularly important for the pursuit of access to justice. The courts accepted the cases on the grounds that the concerns of these organizations represented the public interest. The doctrine of standing now focuses on deciding whether a lawsuit is frivolous or the expression of a judicially defensible public interest and does not preclude cases just because they are not of an individual nature.

The cost of environmental justice

Perhaps most worrying for NGOs and citizens are the costs and risks associated with participating in legal activity in the UK. In the 'loser-pays' fees-system the cost of legal action also includes the potential exposure to the risk of paying the other party's costs should the claimant's legal action fail. As Phil Michaels, former in-house lawyer at Friends of the Earth points out, the problem with the English costs structure is a double one, of risk and uncertainty: 'Not only do claimants risk paying the costs of the other side, but they also have no idea at the outset of proceedings whether, if they lose their case, they will have to find £5000, £50,000, or £150,000' (Michaels, 2004).

In the cases examined here costs were often awarded against the NGOs participating in the case, ranging from several thousand to several hundred thousand pounds. This can have a significant 'chilling effect' on litigation activity. For example, in 1998 in *WWF-UK and RSPB v Scottish Natural Heritage* the NGOs involved in the case were ordered to pay £203,500 in costs (reduced marginally on assessment to £195,500). WWF-UK did not take another legal action again for a full decade for fear of another large costs order being awarded against the organization.

The introduction of Protective Cost Orders (PCOs) by the Court of Appeal in the leading case of *R (Corner House Research) v The Secretary of State for Trade & Industry* [2005] has somewhat changed this picture, but in a more limited way than might have been anticipated at the outset. PCOs were developed to ensure that challenges to decisions of public bodies

which need to be resolved in the public interest are not stifled by the threat that an unsuccessful claimant will have to bear the other side's legal costs. The decision of the Court of Appeal states that a PCO may be provided if a court is satisfied that: the issues raised are of general public importance; the public interest requires that those issues should be resolved; the applicant has no private interest in the outcome of the case; and the financial resources of the applicant and the respondent(s) and the amount of costs likely to be involved are taken into account. An important element in choosing to apply for a PCO is that if the order is not made, the applicant will discontinue the proceedings.

While the advent of PCOs seemed to be a promising avenue for expanding the opportunities to take legal action, interviews with environmental lawyers and those working on access to environmental justice suggest otherwise. An update to the Sullivan Report on Ensuring Access to Justice in Environmental Matters in England and Wales published in August 2010 argued that despite a developing jurisprudence on PCOs, 'it is obvious that tinkering with the Protective Costs Order regime will not be sufficient to address prohibitive costs and secure compliance with Aarhus. A radical change in the Civil Procedure Rules is required, one which recognises the public interest nature of environmental claims' (Sullivan, 2010). Numerous reasons are cited to explain why the PCO regime does not go far enough in addressing uncertainty in terms of costs:

- in many instances the PCO decision comes too late in the proceedings to be of value;
- because of the likelihood of a more favourable outcome on an order if a lawyer is working pro bono it begins to disadvantage lawyers working for environmental NGOs;
- the assumption that a claimant will desist from pursuing a case if an order is not awarded means that for very serious breaches of environmental law a NGO might choose not to pursue a PCO in order to ensure the issue will be addressed by the courts.

Recent case law has developed thinking on PCOs. In a Court of Appeal case *Garner v Elmbridge Borough Council* [2010] Sullivan LJ disapproved of a lower court's decision not to grant a PCO on the basis that there was lack of information about the claimant's financial resources and therefore it was impossible to tell whether the costs would be prohibitively expensive. This moved the discussion about PCOs from one where a subjective test is applied to one where an objective test becomes the standard.

In sum, despite developments in the PCO case law somewhat complicating the picture, much of the evidence suggests that problems with the law on costs remain and could be a contravention of the Aarhus Convention. One of the possible interpretations of the *Garner* decision is that PCOs should be made more widely available and that a detailed analysis of an individual claimant's financial circumstances should not be a prerequisite to the granting of a PCO.

Compliance with the Aarhus Convention

In 2008 ClientEarth, a London-based NGO, made a complaint to the Aarhus Compliance Committee concerning the failure of the UK to provide adequate access to justice in a challenge to the granting of licenses to the Port of Tyne for the disposal of contaminated metals. ClientEarth alleged that law and jurisprudence of the UK fail to comply with the requirements of Article 9, paragraphs 2 to 5. The communication cites restrictions on review of substantive legality in the course of judicial review, limitations on possibility for individuals and NGOs to challenge acts or omissions of private persons which contradict environmental law, the 'chilling effect' of costs rules, and the uncertain and overly restrictive nature of rules related to time limits within which an action for judicial review can be brought in England and Wales. These claims were further supported by an amicus brief by the Coalition on Access to Justice for the Environment (CAJE) in the UK that brings together members from several UK NGOs including the Environmental Law Foundation, Friends of the Earth, Greenpeace, the Royal Society for the Protection of Birds, the Worldwide Fund for Nature, and Capacity Global.

In September 2010 the Aarhus Compliance Committee found the UK to be failing to live up to its full obligations under the Convention in terms of the prohibitive expenses and the timing constraints.² In May 2011 the report of the Compliance Committee outlined the steps the UK had communicated that it was taking in response to the ruling. The majority of the response focuses on costs rules and the amendments to the Civil Procedure Rules in England and Wales to codify case law on PCOs. In its response the UK also informed the Committee that the Ministry of Justice was undertaking public consultations on other recommendations of Lord Justice Jackson's Review of Civil Litigation Costs, including the possibility of moving away from PCOs to qualified one-way cost shifting (a proposal put forward in the Sullivan Update Report on Accessing Justice) and further considerations of the financial burdens associated with interim injunctions. While the Committee commended the UK's engagement on these issues a paragraph in the conclusion summarizes the main implications of the report:

*The Committee considers that, while the measures undertaken by the Party concerned demonstrate progress made towards achieving compliance with article 9 of the Convention, it would be premature to conclude that the Party concerned is no longer not in compliance with the Convention, since the measures have not been implemented and a number of concerns have been raised by the public concerned.*³

The Committee has invited the UK to continue to regularly keep it abreast of its progress in implementing its recommendations.

In parallel to the Aarhus Compliance Committee's proceedings, the European Commission is also pursuing some of these concerns through infringement proceedings against the UK

2. DRAFT FINDINGS, ACCC/C/2008/33.

3. REPORT OF THE COMPLIANCE COMMITTEE ON ITS THIRTY-FIRST MEETING, ECE/MP.PP/C.1/2011/2/Add.9, 5.

government. In response to a complaint made by CAJE in 2005, the Commission is claiming that the UK government has failed to give effect to the European directives implementing the Aarhus Convention. Again, the high cost of legal action to protect the environment was the crux of the complaint. The Commission sent the UK a letter of formal notice in December 2007 and issued the UK with a Reasoned Opinion in March 2010. In April 2011 the European Commission referred the UK to the European Court of Justice for failing to provide equitable access to justice in environmental cases.

Environmental justice in the Scottish context

Finally, it must be noted that the situation in Scotland is markedly different from that in England and Wales. More attention should be paid by policymakers to these differences as they may have a significant impact on the UK's ability to live up to its Aarhus Convention obligations. In Scotland, rules on standing ('title and interest') to take judicial review are applied much more restrictively than in England and Wales. In terms of costs, the Scottish courts have accepted that an equivalent to PCOs in the form of Protective Expenses Orders (PEOs) should exist, but existing case law, see for example *McGinty v Scottish Ministers* [2010] and *Road Sense v Scottish Ministers* [2011], suggests that the Scottish courts rarely grant PEOs that will significantly shape a potential claimant's ability to access justice at a reasonable cost. The policies of the legal aid system in Scotland, which do not generally support public interest cases or the contesting of environmental issues, virtually prohibit the taking of many cases that might otherwise be important for upholding environmental law (see McCartney, 2010).

While on many counts, such as time limits and the right to appeal, the Scottish legal system seems more open to claimants, the initial barriers a citizen faces in accessing justice are problematic. The situation in Scotland seems ripe for change. Several lawyers and activists committed to enhancing access to justice in Scotland are pressing for change through the courts in 2011 and this coincides with the launch of a report

on Compliance with the Aarhus Convention in Scotland as part of an access to justice campaign by Friends of the Earth Scotland in June 2011.

Conclusions

Access to justice matters for democracy. Unless citizens and groups are able to go to court on an equal footing with well-resourced governments and corporations to challenge the legality of decisions made by public authorities, then unlawful decisions will not be identified and overturned. Environmental law, like all law, has little purpose if it is not upheld. This is particularly important in the realm of the environment and climate change, since the environment cannot defend its own (legal) interests, yet its protection is in the interest of all citizens.

NGOs, as organizations with expertise and resources, therefore have an important role to play in both ensuring the effective enforcement of environmental law and in expanding legal opportunities for other groups and citizens. The types of NGOs discussed here are among the largest and best-resourced in the country, yet they regularly lose their legal battles and often have to pay the significant legal costs of their opponents. While the evidence of changes over time seems to suggest that there is an opening of the justice system, this is, at times, a painfully slow process and it may be down to international law and compliance bodies to improve the pace of progress.

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