



Port Health & Environmental Services Committee

Date: TUESDAY, 20 JANUARY 2015
Time: 11.00 am
Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

Wendy Mead (Chairman)	Andrew McMurtrie
Deputy John Tomlinson (Deputy Chairman)	Brian Mooney
Deputy John Absalom	Hugh Morris
Deputy John Bennett (Chief Commoner)	Barbara Newman
Henry Colthurst	Deputy John Owen-Ward
Karina Dostalova	Sheriff & Alderman Dr Andrew Parmley
Deputy Billy Dove	Ann Pembroke
Peter Dunphy	Henrika Priest
Kevin Everett	Deputy Gerald Pulman
Deputy Bill Fraser	Deputy Richard Regan OBE
George Gillon	Delis Regis
Deputy Stanley Ginsburg	Jeremy Simons
Alderman John Garbutt	Deputy James Thomson
Wendy Hyde	Deputy Michael Welbank
Vivienne Littlechild	Mark Wheatley
Professor John Lumley	Philip Woodhouse

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Lunch will be served in Guildhall Club at 1PM
NB: Part of this meeting could be the subject of audio video recording

John Barradell
Town Clerk and Chief Executive

AGENDA

Part 1 - Public Agenda

1. **APOLOGIES**
2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**
3. **MINUTES**
To agree the public minutes and summary of the meeting held on 18 November 2014.

For Decision
(Pages 1 - 10)
4. **BARBICAN RESIDENTS AIR QUALITY MONITORING PROJECT PRESENTATION**
Louise Frances from Mapping for a Change, University College London, to be heard.

For Information
5. **OUTSTANDING ACTIONS**
To note the list of Outstanding Actions.

For Information
(Pages 11 - 16)
6. **CITY OF LONDON CEMETERY AND CREMATORIUM BUSINESS PLAN 2014-17
PROGRESS REPORT (PERIOD 2)**
Report of the Director of Open Spaces.

For Information
(Pages 17 - 26)
7. **MARKETS AND CONSUMER PROTECTION DEPARTMENT BUSINESS PLAN
2014-17 PROGRESS REPORT (PERIOD 2)**
Report of the Director of Markets and Consumer Protection.

For Information
(Pages 27 - 54)
8. **HEATHROW ANIMAL RECEPTION CENTRE ANNUAL REVIEW OF CHARGES**
Report of the Director of Markets and Consumer Protection.

For Decision
(Pages 55 - 62)
9. **STREET TRADING UPDATE**
Report of the Director of Markets and Consumer Protection.

For Information
(Pages 63 - 68)
10. **DEPARTMENT OF THE BUILT ENVIRONMENT BUSINESS PLAN PROGRESS
REPORT (PERIOD 2)**
Report of the Director of the Built Environment.

For Information
(Pages 69 - 78)

11. **CLEANSING SERVICE CAMPAIGNS UPDATE**
Report of the Director of the Built Environment.
For Information
(Pages 79 - 88)
12. **HOUSEHOLD RECYCLING SERVICES AND THE REQUIREMENTS OF THE WASTE REGULATIONS 2011 (AMENDED 2012) "TEEP"**
Report of the Director of the Built Environment.
For Decision
(Pages 89 - 138)
13. **THIRD YEAR PERFORMANCE REVIEW OF THE DOMESTIC WASTE COLLECTION AND STREET CLEANSING CONTRACT**
Report of the Director of the Built Environment.
For Information
(Pages 139 - 146)
14. **QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
15. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT**
Any items of business that the Chairman may decide are urgent.
16. **EXCLUSION OF THE PUBLIC**
MOTION – That under Section 100(A) of the Local Government Act 1972, the public be excluded from the meeting for the following items on the grounds that they involve the likely disclosure of exempt information as defined in Part I of the Schedule 12A of the Local Government Act.

Part 2 - Non-public Agenda

17. **NON-PUBLIC MINUTES**
To agree the non-public minutes of the meeting held on 18 November 2014.
For Decision
(Pages 147 - 150)
18. **CITY OF LONDON CEMETERY AND CREMATORIUM ANNUAL FEES AND CHARGES**
Report of the Director of Open Spaces.
For Decision
(Pages 151 - 160)
19. **URGENT WAIVER REQUEST - THE SHOOT**
Report of the Director of Open Spaces.
For Information
(Pages 161 - 166)

20. **OPERATION BROADWAY - A JOINT INITIATIVE BETWEEN THE CITY OF LONDON TRADING STANDARDS SERVICE AND THE CITY OF LONDON POLICE**
Report of the Director of Markets and Consumer Protection.
For Decision
(Pages 167 - 172)
21. **RENEW ON-STREET RECYCLING UNITS - APPROVAL TO TERMINATE CONTRACT**
Report of the Director of the Built Environment.
For Decision
(Pages 173 - 190)
22. **PROPOSED CHARGES FOR STREET CLEANSING, WASTE COLLECTION AND PUBLIC CONVENIENCES 2015/16**
Report of the Director of the Built Environment.
For Decision
(Pages 191 - 200)
23. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**
24. **ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED**

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 18 November 2014

Minutes of the meeting of the Port Health & Environmental Services Committee held at the Guildhall EC2 at 11.00 am

Present

Members:

Wendy Mead (Chairman)	Barbara Newman
Deputy John Tomlinson (Deputy Chairman)	Ann Pembroke
Peter Dunphy	Henrika Priest
George Gillon	Deputy Gerald Pulman
Deputy Stanley Ginsburg	Deputy Richard Regan OBE
Alderman John Garbutt	Delis Regis
Vivienne Littlechild	Jeremy Simons
Professor John Lumley	Deputy James Thomson
Andrew McMurtrie	Mark Wheatley
Hugh Morris	Philip Woodhouse

Officers:

David Arnold	Town Clerk's Department
Neil Davies	Town Clerk's Department
Jenny Pitcairn	Chamberlain's Department
Julie Smith	Chamberlain's Department
Paul Dudley	Chamberlain's Department
Paul Nagle	Chamberlain's Department
Paul Chadha	Comptroller and City Solicitor's Department
Philip Everett	Director of the Built Environment
Doug Wilkinson	Department of the Built Environment
Steve Presland	Department of the Built Environment
Jim Graham	Department of the Built Environment
Vincent Dignam	Department of the Built Environment
David Smith	Director of Markets and Consumer Protection
Jon Averbs	Department of Markets and Consumer Protection
Ruth Calderwood	Department of Markets and Consumer Protection
Sue Ireland	Director of Open Spaces
Gary Burks	Superintendent & Registrar, City of London Cemetery & Crematorium
Tony Halmos	Director of Public Relations
Andrew Buckingham	Public Relations Office
Greg Williams	Public Relations Office

1. **APOLOGIES**

Apologies were received from Deputy John Absalom, Deputy John Bennett, Henry Colthurst, Karina Dostalova, Deputy Billy Dove, Deputy Bill Fraser, Wendy Hyde, Sheriff & Alderman Dr Andrew Parmley, and Philip Woodhouse.

2. **MEMBERS' DECLARATIONS UNDER THE CODE OF CONDUCT IN RESPECT OF ITEMS ON THE AGENDA**

There were none.

3. **MINUTES**

RESOLVED – That the public minutes of the previous meeting held on Tuesday 16 September 2014 be agreed.

4. **OUTSTANDING ACTIONS**

RESOLVED – That the outstanding actions be noted.

Matters Arising

A Member noted that the ground floor West Wing toilets in Guildhall were a positive addition to the Community Toilets Scheme. She added that some of the signage in local businesses' windows could be larger to increase public awareness of the service.

5. **PUBLIC RELATIONS UPDATE**

The Committee received a report of the Director of Public Relations that highlighted the activities of the PR Office, in the period October 2013 to October 2014, in support of the services for which this Committee was responsible.

In addition to the media highlights detailed in the report, Members were also advised of a recent newspaper story regarding the re-use of graves at the City of London Cemetery and Crematorium.

Members expressed their thanks to the Director of Public Relations and his team for supporting the work of the Committee through the media and other communications work.

RESOLVED – That the PR activities during the period October 2013 to October 2014 be noted.

6. **RISK MANAGEMENT STRATEGY**

The Committee received a report of the Chamberlain that introduced the new Risk Management Strategy, which was approved by the Audit and Risk Management Committee 13 May 2014.

Members were advised that the key risks in the Department of Markets and Consumer Protection, the Department of the Built Environment, and the Open Spaces Department's risk registers would be reported to this Committee periodically.

The Head of Audit and Risk Management also advised that the Department of Markets and Consumer Protection risk review had been postponed until early 2015.

RESOLVED – That the new Risk Management Strategy and plans for the phased roll-out of the strategy within Departments and City of London Corporation institutions, be noted.

7. REVENUE AND CAPITAL BUDGETS 2015/16

The Committee received a joint report of the Chamberlain, the Director of the Built Environment, the Director of Markets and Consumer Protection, and the Director of Open Spaces that sought approval to the provisional revenue budget for 2015/16.

Members were advised that the budget for recycling costs was originally reduced from £50,000 to £30,000 but it was identified as a high risk item. Changes in the market since that proposal was put forward had increased the forecast recycling costs to £72,000, however the market remained unpredictable.

RESOLVED – That:-

- a) The provisional 2015/16 revenue budget be approved for submission to the Finance Committee;
- b) The draft capital budget be approved;
- c) The Chamberlain be authorised to revise the budgets to allow for further implications arising from potential budget developments including developments in the Port Health service relating to changing trade, changes to Additional Works Programme and changes in respect of recharges; and
- d) If other Committees request that further Service Based Review proposals be pursued, that the substitution of other suitable proposals for a corresponding amount is delegated to the Town Clerk in consultation with the Chairman and Deputy Chairman. If the substituted saving is not considered to be straightforward in nature, then the Town Clerk shall also consult the Chairman and Deputy Chairmen of the Policy and Resources Committee prior to approving an alternative proposal(s).

8. HEALTH AND WELLBEING BOARD ACTION PLAN

The Committee received a report of the Director of Community and Children's Services regarding the action plan to deliver the Joint Health and Wellbeing Strategy.

RESOLVED – That the Joint Health and Wellbeing Strategy action plan be noted.

9. CITY OF LONDON AIR QUALITY STRATEGY 2015 - 2020

The Committee considered a report of the Director of Markets and Consumer Protection that sought approval of the draft air quality strategy, which was for consultation until 31 January 2015.

Members were advised that the strategy was a revision to the 2011 strategy that contained 59 actions grouped into 10 key policy areas for improving air quality and reducing the impact of air pollution on public health until 2020. Members requested that the final version be presented back to Committee in 2015.

RESOLVED – That:-

- a) the draft air quality strategy for consultation until 31 January 2015, be approved; and
- b) delegated authority be granted to the Town Clerk, in consultation with the Chairman and Deputy Chairman, to consider the responses from the Greater London Authority and Transport for London to the Ultra-Low Emission Zone proposals for central London.

10. ECONOMIC DEVELOPMENT AND LOCAL AUTHORITY REGULATION

The Committee received a report of the Director of Markets and Consumer Protection that informed Members of the outcome of the investigation that followed the publication of the report titled Economic Development and Regulation by the Better Regulation Delivery Office in October 2014.

RESOLVED – That the report be noted.

11. 42ND CITY OF LONDON THAMES FISHERY RESEARCH EXPERIMENT 2014

The Committee considered a report of the Director of Markets and Consumer Protection that informed Members of the outcome of the 42nd City of London Thames Fishery Experiment held in September 2014 and sought approval for the 43rd City of London Thames Fishery Experiment to be held on 10 October 2015.

RESOLVED – That:-

- a) The outcome of the 42nd City of London Thames Fishery Experiment be noted; and
- b) The 43rd City of London Thames Fishery Experiment on 10 October 2015 be supported and approved.

12. NEW ANTI-SOCIAL BEHAVIOUR, CRIME AND POLICING ACT 2014 - DELEGATED POWERS

The Committee considered a report of the Director of the Built Environment regarding the provisions of the Anti-Social Behaviour, Crime and Policing Act 2014, which received Royal Assent on 13 March 2014 and came into effect on 20 October 2014.

Members were advised that, in adopting the Act, it would be necessary to amend the City of London Corporation's Scheme of Delegation and would also require close and coordinated working with partner organisations.

In response to a Members question, the Assistant Director of Street Scene, Strategy and Safer City Partnership advised that the City of London Corporation would have greater flexibility to deal with situations relating to Anti-

Social Behaviour. In response to a further question, the Director of the Built Environment advised that a meeting would be taking place with the Chairman and Deputy Chairman of the Licensing Committee in early 2015 to discuss the Anti-Social Behaviour issues that arise from large groups of people congregating on walkways. He added that there was currently no highways legislation that gave powers to the City of London Corporation regarding people congregating on walkways but options to prevent it would be looked into.

RESOLVED – That:-

- a) delegated authority for the Director of Built Environment and the Director of Markets and Consumer Protection or their authorised Deputy to seek an Injunction to Prevent Nuisance and Annoyance in accordance with Part 1 of the Anti-Social Behaviour, Crime and Policing Act 2014, be approved;
- b) delegated authority for the Director of Built Environment and the Director of Markets and Consumer or their authorised Deputy to apply for Closure Orders and to authorise their officers to issue Closure Notices and in accordance with Part 3 of the Anti-social Behaviour, Crime and Policing Act 2014, be approved;
- c) delegated authority for the Director of Built Environment and the Director of Markets and Consumer Protection to authorise Officers to serve Community Protection Notices, and Fixed Penalty Notices in the event of a breach, in accordance with Part 4 of the Anti-social Behaviour, Crime and Policing Act 2014, be approved;
- d) the Director of Built Environment and the Director of Markets and Consumer Protection having the ability to designate Registered Social Landlords to issue Community Protection Notices, in accordance with Part 4 of the Anti-social Behaviour, Crime and Policing Act 2014, be approved;
- e) the Director of Built Environment and the Director of Markets and Consumer Protection having the ability to authorise Police Community Support Officers and other Police staff to serve Community Protection Notices and Fixed Penalty Notices, in accordance with Part 4 of the Anti-social Behaviour, Crime and Policing Act 2014, be approved; and
- f) delegated authority for the Director of Built Environment and the Director of Markets and Consumer Protection or their authorised Deputy to seek Criminal Behaviour Orders, in accordance with Part 2 of the Anti-Social Behaviour, Crime and Policing Act 2014, be approved.

13. HOUSEHOLD RECYCLING SERVICES AND THE REQUIREMENTS OF THE WASTE REGULATIONS 2011 (AMENDED 2012) "TEEP"

The Committee received a report of the Director of the Built Environment regarding the revised EU Waste Framework Directive (rWFD) that included a requirement for all collectors of waste to take measures to promote high quality recycling, which was transposed into English legislation by the Waste (England and Wales)(Amendment) Regulations 2012.

Members were advised it would be necessary for the City of London Corporation to review the way municipal recycled material was collected and to complete a formal assessment to ascertain whether it was technically,

environmentally or economically practicable ('TEEP') to collect source separated recycling material. A report detailing the outcome of this assessment would be presented to the next appropriate Committee meeting.

RESOLVED – That:-

- a) The report be noted; and
- b) A further report specifying the outcome of the assessment and the detail of any changes in service required, if any, to achieve full compliance with the regulations, be presented to a future Committee meeting.

14. FIVE YEAR EXTENSION OF LONDON WIDE HAZARDOUS WASTE COLLECTION AND DISPOSAL SERVICE

The Committee considered a report of the Director of the Built Environment regarding the London-Wide Hazardous Waste Collection and Disposal Service. Members were advised that the current five-year contract commenced on 1 October 2010 and included an option to extend. The report sought approval for a five-year extension to this contract.

In response to a Member's question, the Assistant Cleansing Director advised that being the lead authority for the Service came at no cost to the City of London Corporation. He added that this contract provided a London-wide service that would otherwise be too fragmented and inefficient that being the lead authority was seen as a good opportunity for the City.

RESOLVED – That:-

- a) The City of London Corporation continue to act as lead authority for the provision of a London-Wide Hazardous Waste Collection and Disposal Service; and
- b) A formal agreement with PHS Waste Management for a five-year extension to the existing contract be approved, subject to such amendments as may be agreed by the Comptroller and City Solicitor and to the participating Borough's agreement of the contract extension.

15. ITEMS PLACED ON THE HIGHWAY (STREETS AND PAVEMENTS)

The Committee received a report of the Director of the Built Environment regarding the adoption of a policy to enable the safe management of footpaths and the street environment in a proportionate manner.

The Assistant Director of Street Scene and Strategy advised that comments received from Members following a recent report indicated the issues being experienced on the City's streets were wider than just 'A' Boards, which was agreed with by Members of this Committee.

Members then discussed the following issues relating to items placed on streets and pavements:

- Tables, chairs, pots and plants outside businesses often caused obstructions on walkways that prevented people, particularly the elderly, partially sighted and disabled, from walking past. The Assistant Director of Street Scene and Strategy advised that the Access Team and the

Health and Wellbeing Board would be consulted regarding items on the highway causing difficulties for disabled people.

- Small businesses required better signage in their area to advertise their location to customers, which would prevent the need for them to deploy 'A' Boards on the walkway at their entrance.
- In relation to the City of London Footway Guidance, a Member noted that the requirement for a minimum of 2 metres of unobstructed width may still have been too narrow for busy City streets. The Assistant Director of Street Scene and Strategy advised that this distance was a requirement for the narrowest point but the Guidance note could be reviewed.
- In relation to the walkway outside Barbican Station, a Member noted that obstructive items had been removed only to be replaced by a large bin. The Assistant Director of Street Scene and Strategy would meet with the Member to observe this particular bin.
- A Member, also the Deputy Chairman of the Licensing Committee, noted that the issue of people obstructing walkways could be dealt with by entering into voluntary agreements with business owners to ensure that their customers only gathered on one side of the walkway. Staff would come outside regularly to collect glasses and at the same time ask customers to move to an area that would not obstruct the walkway.
- Another Member added that he would approach owners of a business in the Ward of Cheap regarding a potential agreement to reduce obstructions outside their entrance.

RESOLVED – That:-

- a) the report be noted; and
- b) Members' comments be presented to the Health and Wellbeing Board, Streets and Walkways Sub Committee, Policy and Resources Committee, and the Planning and Transportation Committee.

16. QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE

In response to a question raised by a Member who was not present, the Director of Port Health and Public Protection (PHPP) advised that the Food Standards Agency (FSA) would be making it mandatory for food outlets to display their Food Standards score. He also advised that the City of London Corporation would be promoting a 'Look before you Book' campaign during the Christmas period.

17. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

The Committee were shown a video to advertise the new Community Toilet Scheme app by Mick Hurst, the developer. Members were advised that the app was still under development so other languages may be able to be added to benefit tourists in the City. The app could eventually be expanded to other formats to enable people to locate the nearest museums or police stations using the same technology. In response to a Member's question, the Assistant Cleansing Director advised that he would consult with the Visitors Centre to establish whether the app could be incorporated into existing similar apps for local galleries and theatres.

The Chairman advised new Members of the Committee to contact the Director of Port Health and Public Protection if they wished to purchase a Port Health tie.

18. **EXCLUSION OF THE PUBLIC**

RESOLVED – That under Section 100a(4) of the Local Government Act 1972, the public be excluded from the meeting for the following items of business on the grounds that they involved the likely disclosure of exempt information as defined in Part I of Schedule 12A of the Local Government Act.

Item No.	Paragraph No.
19	3
20–21	3 & 4
22	4
23	3

19. **NON-PUBLIC MINUTES**

RESOLVED – That the non-public minutes of the meeting held on 16 September 2014 be agreed as a correct record.

20. **SERVICE BASED REVIEW PROPOSALS - DEPARTMENT OF THE BUILT ENVIRONMENT**

The Committee considered a report of the Director of the Built Environment regarding the Service Based Review proposals for the Department of the Built Environment.

21. **SERVICE BASED REVIEW PROPOSALS - DEPARTMENT OF MARKETS & CONSUMER PROTECTION**

The Committee considered a report of the Director of Markets and Consumer Protection regarding the Service Based Review proposals for the Department of Markets and Consumer Protection.

22. **PUBLIC CONVENIENCES STRATEGY - UPDATE & PROPOSED SAVINGS OPTIONS**

The Committee considered a report of the Director of the Built Environment regarding the Public Conveniences Strategy 2014 – 17.

23. **DEBT ARREARS – PORT HEALTH AND ENVIRONMENTAL SERVICES PERIOD ENDING 30 SEPTEMBER 2014**

The Committee received a joint report of the Director of the Built Environment, the Director of Markets and Consumer Protection, and the Director of Open Spaces regarding debt arrears for the period ending 30 September 2014.

24. **NON-PUBLIC QUESTIONS ON MATTERS RELATING TO THE WORK OF THE COMMITTEE**

There were none.

25. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERED URGENT AND WHICH THE COMMITTEE AGREES SHOULD BE CONSIDERED WHILST THE PUBLIC ARE EXCLUDED

There was none.

The meeting closed at 12.55 pm

Chairman

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Date	Action	Officer responsible	To be completed/ progressed to next stage	Notes/Progress to date
8 January 2013	<p>Public Conveniences</p> <p>TfL who are currently exploring improvements to the Bishopsgate area to make the area more attractive and remove some of the clutter such as the brick planters.</p> <p>An update on the viability of extending the opening hours of the Bishopsgate and Eastcheap toilets will be included in the Public Convenience Strategy planned for November committee.</p> <p>Usage of the Disabled facilities at Monument and signage were also being reviewed and this will form part of the wider review of the public convenience strategy which will be reported back to this committee as above.</p> <p>Improved signage has been commissioned to direct people to the nearby Eastcheap facilities.</p>	Director of the Built Environment	<p>Presented to the Committee May 2014</p> <p>November 2014</p> <p>November 2014</p> <p>TBC</p>	<p>May Update</p> <p>Due to diaries commitments there has been a slight delay in organising the feedback session to the Member working group. This session is scheduled to take place on the 30th April where Members will receive the outcomes of the field work and recommendations.</p> <p>July Update</p> <p>PHES Committee received a presentation from Karen Bunt of TNS showing the results of the customer satisfaction survey. There were a number of recommendations for officers to consider as a result of the feedback. Currently we are awaiting the outcome of the service based reviews (SBR) which is expected over the Summer; officers will then be able to develop a forward strategy for the public convenience service with an understanding of the SBR and the recommendations of the customer satisfaction survey. With a report coming to PHES in November 2014.</p> <p>January 2015 Update</p> <p>This action will be shown as complete as a</p>

				final report was presented at November committee meeting. It will be replaced by Service Base Review Savings Programme which incorporates the Public Conveniences and will be reported at regular intervals to keep Members updated as to progress.
2 July 2013	Materials Recovery Facility (MRF) visit <ul style="list-style-type: none"> - It was agreed that a visit to the Southwark MRF facility would be arranged. 	Director of the Built Environment		<p>A very informative visit to the Veolia MRF in Southwark took place on the 23rd June with seven members of the PHES committee attended. The tour of the full facility was well received.</p> <p>January Update A second visit to the Veolia MRF will be arranged in spring 2015 to give those Members unable to attend on 23 June 2014 the opportunity to visit the facility.</p>
16 July 2014	Ludgate Hill Pedestrian Crossing	Assistant Director of Street Scene and Strategy	September 2014	<p>Members requested a start date for the Pedestrian Crossing trial at Ludgate Hill once it had been finalised, along with a briefing note outlining the current situation.</p> <p>September Update Members received a note from the Department of the Built Environment in August 2014 to advise that TfL considered the City's various feasibility studies to determine the effect of replacing the existing zebra crossing with signal equipment was outdated. In order to</p>

				<p>proceed with the trial, new traffic modelling should be undertaken to assess the impacts on the Strategic Road Network.</p> <p>November Update The trial has been delayed until early 2015 due to a request from Transport for London (TfL) for further survey work to be carried out. Progress is being made and the project has been approved by Streets and Walkways committee and Project Sub-committee.</p> <p>January 2015 Update Construction works started on 6 January 2015. Traffic management will be the same arrangements which were in place before Christmas, thus a westbound diversion from New Change to Ludgate Circus.</p> <p>TfL will install the traffic lights once the footway works have been completed, resulting the entire construction period expected to last until mid-February.</p> <p>Following completion, monitoring work will be undertaken.</p>
16 September 2014	Comingled Dry Mixed Recycling Contamination	Assistant Director of Street Cleansing	March 2015	<p>A further report outlining actions in response to the contamination of recycling will be presented to the next Committee meeting.</p> <p>.</p>

	<ul style="list-style-type: none"> - A wider range of waste items may be able to be recycled once a new MRF is procured - To look at the costs involved of providing free recycling bags to all City residents 			
16 September 2014	Sustainability	Town Clerk	Ongoing	If Committee Members are interested in taking a more joined up look at its responsibilities, the Town Clerk could look into the possibilities of setting up a small sub group to discuss challenges.
18 November 2014	Anti-Social Behaviour	Director of the Built Environment	Ongoing	<p>A meeting is taking place in mid-January 2015 with the Chairman and Deputy Chairman of the Licensing Committee to discuss Anti-Social Behaviour issues that arise from large groups of people congregating on walkways. There is currently no highways legislation that gives powers the City of London Corporation regarding this issue but options to prevent it will be looked into.</p> <p>The new powers introduced by the Anti-Social Behaviour, Crime and Policing Act 2014 was also approved by the Community and Children's Services Committee in December 2014. The new powers will be considered by the Court of Common Council on January 15 2015.</p>

18 November 2014	Air Quality Transport for London Consultation on the Ultra Low Emission Zone (ULEZ)	Director of Port Health and Public Protection	January 2015	The City of London Corporation's response to the Consultation was approved by the Chairman and Deputy Chairman of this Committee under delegated authority, and the Chairman and Deputy Chairman of the Policy and Resources Committee under urgency, and submitted to TfL on 9 January 2015.
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Committee(s):	Date(s):
Port Health and Environmental Services	20 January 2015
Subject: Cemetery and Crematorium Business Plan 2014-2017: Progress Report (Period 2)	Public
Report of: The Director of Open Spaces	For Information
Summary	
<p>This report provides an update on progress against the elements of the Open Spaces Business Plan 2014-17 which relate to the City of London Cemetery and Crematorium, including performance against key performances indicators (KPIs), financial data and a report of delivery of key projects.</p> <p>The report consists of:</p> <ul style="list-style-type: none"> • Performance against our key performance indicators (KPIs) – Appendix A • Status of key risks – Appendix B • Financial information – Appendix C <p>Key points from the report are that:</p> <ul style="list-style-type: none"> • At the end of the November 2014, the Cemetery and Crematorium budget was underspent. Committed and actual expenditure of £1,773,455 was made, representing 62.1% of the budget for the whole year. Two thirds of the way through the year income of £2,851,714 was generated, representing 68.3% of budgeted income for the full year. Appendix C sets out the detailed position for the Cemetery and Crematorium budget. • Performance has been good against key indicators with better financial performance than at the same point in the previous year. • Good progress has been made in delivering key projects, in particular on the Shoot Project to deliver additional burial space <p>Recommendation(s) Members are asked to note the content of this report and its appendices.</p>	

Main Report

Background

1. In the 2014-17 Department of Open Spaces Business Plan identified Key Performance Indicators (KPIs) to facilitate measurement of the performance of the Cemetery and Crematorium. At the end of period two of the financial year (end of November) all KPIs are being achieved.

2. The Business Plan sets out key projects for the Cemetery and Crematorium during 2014-15. The two key projects identified in the plan for the Cemetery and Crematorium are the Shoot Project and the Service Based Review. In both cases good progress has been made.

Current Position

3. To ensure that your Committee is kept informed of progress against the current business plan, progress against KPIs (Appendix A) and key objectives is reported on a periodic (four-monthly) basis, along with a financial summary (Appendix C). This approach allows Members to ask questions and have a timely input on areas of particular importance to them. Members are also encouraged to ask the Directors for information throughout the year.
4. Periodic progress is also discussed by the Open Spaces Senior Management Team to ensure any issues are resolved at an early stage.
5. Currently performance against key performance indicators is good. The percentage of cremations is similar to those in the preceding year (see Appendix A for further details) but the number of burials has fallen slightly on last year. Additionally the abated cremator has been used for 64.5% of cremations, above the 62.5% level achieved at the same point in 2013/14. However, as shown in the table below, income is in a strong position at present.
6. Progress has been made to deliver additional burial space at the Cemetery and Crematorium through the delivery of the Shoot Project. Planning consent has been secured, with work currently being undertaken to discharge associated conditions. Additionally the contract for works is about to be let.
7. Progress has also been made in implementing the Service Based Review savings for the Cemetery and Crematorium. These were initially agreed as a saving of £213,000 to be made in the financial year 2017/18. Since the proposal were agreed, the Superintendent of the Cemetery and Crematorium has carried out further market analysis and has proposed that £66,000 of increased income be budgeted for the financial year 2015/16, effectively bringing forward a proportion of the saving.

Financial and Risk Implications

8. The end of November 2014 monitoring position for the City of London Cemetery and Crematorium is provided at Appendix C. This reveals a net underspend to date of £129,000.
9. Strong income performance in the first two thirds of the year accounts for the better than expected budget performance. The table below shows the income generated by the main services provided, compared to the same period in 2013/14. There is a small variance between the figures reported below and those in the appendix. This is due to the figures below reflecting monies yet to be banked.

Item	(£) 2013/14 end Nov £'000	(£) 2014/15 end Nov £'000
Cremations	937	1,062
New graves	588	583
Interments	472	516
New memorial garden	121	134
Rededications	300	317
Book of Remembrance	22	18
Grave Care	64	56
Permits	60	67
Total	2,680	2,852

10. The better than budget forecast position at the end of November 2014 is principally due to additional income from cremations. This represents a 13% increase and is partially due to the 8% increase in fees from April 2014 and partially due to an increase in deaths in the area served.
11. The Superintendent of the Cemetery and Crematorium anticipates that this current better than budget position will continue to year end, subject to income activity maintaining its current high performance.
12. Risks at the Cemetery and Crematorium continued to be monitored and managed. During the second reporting period the crematorium experienced some significant problems with cremator maintenance due to issues with the planning of maintenance work and relationships between the main and sub-contractors. This was resolved by a series of meetings in October. Therefore no changes have been made to the status of existing risks. An extract from the departmental risk register is included at Appendix B. The satisfactory progress of the Shoot Project and development of grave reuse means that the status of the risk relating to ensuring sufficient burial space retains its overall 'green' assessment. The project will continue to be a priority for the Superintendent of the Cemetery and Crematorium.

Corporate & Strategic Implications

13. The performance outcomes for the City of London Cemetery and Crematorium Division link to all three Corporate Plan Strategic Aims (To support and promote 'The City'; To provide modern, efficient and high quality local services for the Square Mile; and, To provide valued services to London and the nation).

Consultees

14. The Town Clerk and the Chamberlain have been consulted in the preparation of this report.

Appendices

- Appendix A – Key Performance Indicators Period 2 2014-15
- Appendix B – Key Risks
- Appendix C – Financial Statement: Cemetery and Crematorium

Background Papers

Department of Open Spaces Business Plan 2014-17

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Cemetery and Crematorium KPI Figures

Appendix A

2013/14	April	May	June	July	Average 1st 4 months	August	Sept	Oct	Nov	Average after 8 months	Dec	Jan	Feb	Mar	Average for the full year
Achieve 8% Market Share of Burials	7.4	8.03	8.7	7.2	7.8	9.1	9.3	7.5	9.4	8.6	8.2	5.9	6.5	7.5	7.4
Achieve 23% Market Share of Cremations	20.7	27.2	22.4	20.2	22.6	27.8	23.3	22.7	24	24.08	19	24.1	22.4	20.4	22.5
Carry out 60% of cremations using the new cremator	66.9	55.7	61.1	70.7	63.6	62.1	67.1	57.9	61.8	62.5	25.6	53.9	72.4	67.3	56.3

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1. Please note that cremation figures suffered slightly in the autumn when the crematorium was out of action for four weekends due to the instalation of PV's and the reline of No1 cremator.
2. Cremation % for the year is shown as 56.1% as this is the mean of the monthly stats. If you take the stats for the whole year as a percentage the figure is 60.3%.

2014/15	April	May	June	July	Average 1st 4 months	August	Sept	Oct	Nov	Average after 8 months	Dec	Jan	Feb	Mar	Average for the full year
Achieve 8% Market Share of Burials	8.00%	7.80%	9.00%	7.7	8.1	8.6	8.2	6.5	7.5	7.8					
Achieve 23% Market Share of Cremations	24.50%	22.40%	24.60%	23.4	23.7	22.3	26.7	24.3	23	24					
Carry out 60% of cremations using the new cremator	69.4	69.9	62.8	68.4	67.6	71.5	61.6	58	63.7	64.5					

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Risk No.	Risk (Short description)	Risk Owner	Existing Controls	Current Risk				Planned Actions	Target Risk		
				Likelihood	Impact	Rating	Direction		Likelihood	Impact	Rating
1	Failure of health and safety procedures	Director of Open Spaces	<ul style="list-style-type: none"> Health and Safety Departmental Policy Departmental and site specific policies Risk assessments and safe systems of work Ongoing programme of staff training in Health and Safety Departmental audit system and departmental working group to ensure policies and procedures are understood and implemented Monitoring of incidents/accidents data and follow up corrective actions 	Possible	Major	A	↔	<ul style="list-style-type: none"> Ongoing annual audits and completion of follow up actions, monitored by the departmental technical manager; Ongoing monitoring of incidents/accidents data; Development and agreement of further policies (Tree Policy July 2014) Quarterly meeting of departmental H&S group to share best practice 	Unlikely	Major	A
2	Financial failure through failure to deliver service to budget, failure to deliver SBR savings and failure to develop income streams to targets; failures to secure additional burial space to ensure sustainability of income	Superintendents	Monthly monitoring of income at all sites; annual review of all fees and charges	Possible	Serious	A	↓	Progression of the Shoot Project; continued monitoring and development of income streams	Unlikely	Serious	G
3	Deterioration of buildings, plant and machinery through lack of maintenance leading to health and safety risks, disruption to operations and reputational impact	Superintendents & City Surveyors	Regular meetings between officers from City Surveyors and officers at sites to plan and prioritise works; delivery of the Additional Works Programme	Possible	Serious	A	↑	Development of strategy to rationalise operational buildings across open spaces; regular meetings between Director of Open Spaces and City Surveyors to be continued	Possible	Minor	G
4	Impact of anti-social behaviour at sites incurring increased risks to visitor, increased costs and negative publicity	Superintendents	Regular staff presence at sites; liaison with local police	Likely	Minor	G	↔	Development of links with police forces in areas neighbouring sites.	Unlikely	Minor	G
5	Failure to recruit and retain staff with required skills	Superintendents	Departmental training plan agreed; investment in ongoing training; investment in external training such as the Cremation Technicians Training Scheme	Likely	Serious	A	↔	Identification and training of staff to fill key roles in future years	Rare	Minor	G
6	Risk of theft due to cash handling in offices with few members of staff		Cash handling guidance notes in place at all sites; use of CCTV cameras on safes; appropriate insurance in place	Rare	Minor	G	↔	Review of all cash handling guidance notes	Rare	Minor	G

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Department of Port Health & Environmental Services Local Risk Revenue Budget - 1st April - 30th November 2014
(Income and favourable variances are shown in brackets)

Appendix C

	Latest Approved Budget 2014/15 £'000	Budget year to date (Apr-Nov)			Actual year to date (Apr-Nov)			Variance Apr-Nov £'000	Forecast for the Year 2014/15			Note
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000		LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	
Open Spaces (City Fund) <small>City of London Cemetery and Crematorium</small>	(1,424)	1,833	(2,783)	(950)	1,773	(2,852)	(1,079)	(129)	(1,424)	(1,424)	0	1
TOTAL PORT HEALTH AND ENVIRONMENTAL SERVICES COMMITTEE LOCAL RISK	(1,424)	1,833	(2,783)	(950)	1,773	(2,852)	(1,079)	(129)	(1,424)	(1,424)	0	

Notes:

1. Income at the Cemetery for the first eight months of the year is higher than anticipated by approximately £69k and there is currently an underspend of £60k on expenditure to date. It is expected that expenditure will be on target by year end and it is expected that the income targets will be achieved.

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Committee(s):	Date(s):
Port Health and Environmental Services	20 January 2015
Subject: Markets and Consumer Protection Business Plan 2014-2017: Progress Report (Period 2)	Public
Report of: The Director of Markets and Consumer Protection	For Information

Summary

This report provides an update on progress against the key performance indicators (KPIs) and objectives outlined in the Business Plan of the Port Health and Public Protection Division (PH&PP) of the Department of Markets and Consumer Protection (M&CP), for Period 2 (August-November) of 2014-15.

The report consists of:

- Performance against our key performance indicators (KPIs) – Appendix A
- Progress against our key objectives – Appendix B
- Enforcement activity – Appendix C
- Key risks – Appendix D
- Financial information – Appendix E

Key points from the report are that:

- The City is working with the Greater London Authority (GLA), other local authorities, organisations and partnerships to address pan-London issues which impact air quality in the City and is implementing actions identified within the City of London Air Quality Strategy (recently reviewed and currently out for consultation).
- There have been three voluntary closures of food premises following imminent risks to health caused by issues such as pest infestations and inadequate facilities and procedures.
- The Health & Safety Team ran income generating training courses for 40 local authority health and safety enforcement staff on controlling legionella in hot and cold water systems.
- The Trading Standards Team continues its involvement in Operations Addams and Curie, which are large fraud investigations. Both operations are proceeding well; arrests have been made.
- The Pollution Team has been working with Crossrail to reduce any potential impacts on the Barbican Concert Hall, the Barbican Centre and residents when its tunnel boring machines reach the area in February 2015.
- The Animal Health Team is carrying out criminal investigations on individuals involved in the illegal importation of puppies from Eastern Europe. Some of these investigations are in tandem with other local authorities.
- The operators of London Gateway Port have announced that three new shipping lines will be calling at the Port with effect from November 2014; they predict a doubling of overall throughput of containers by this time next year.

- At the end of the November 2014, the Department of Markets & Consumer Protection was £158k (9%) underspent against the local risk budget to date of £1.7m, over all the services managed by the Director of Markets & Consumer Protection covered by the Port Health & Environmental Services Committee. Appendix E sets out the detailed position for the individual services.

Recommendation(s)

Members are asked to note the content of this report and its appendices.

Main Report

Background

1. In the 2014-17 Department of Markets and Consumer Protection (M&CP) Business Plan eight Key Performance Indicators (KPIs) were identified to facilitate measurement of performance across the Port Health and Public Protection (PH&PP) Division. The KPIs were selected to be representative of the main elements of work carried out.
2. The Business Plan also sets out six key objectives for the PH&PP Division.

Current Position

3. To ensure that your Committee is kept informed of progress against the current business plan, progress against KPIs (Appendix A) and key objectives (Appendix B) is reported on a periodic (four-monthly) basis, along with a financial summary (Appendix E). This approach allows Members to ask questions and have a timely input on areas of particular importance to them. Members are also encouraged to ask the Directors for information throughout the year.
4. Periodic progress is also discussed by Senior Management Groups to ensure any issues are resolved at an early stage.
5. In order to provide further information on the work carried out by the PH&PP Division, each periodic report includes a summary of the enforcement activity carried out (Appendix C) and the Division's key risks (Appendix D).

Air Quality

6. Failure to achieve EU prescribed air quality limit values and deadlines in the City, which could result in a fine of an unknown amount, has been identified as a high (red) risk for M&CP (Appendix D). Existing systems and controls allow the City to demonstrate that it is taking sufficient effective action to help the government and the Greater London Authority (GLA) to meet these limit values.
7. With the aim of reducing the risk to a medium (amber) level, the City is also working with the GLA, other local authorities, organisations and partnerships

to address pan-London issues which impact air quality in the City. In addition, actions identified within the City of London Air Quality Strategy (recently reviewed and currently out for consultation) are being implemented, including:

- encouraging City businesses to take small steps to reduce emissions of pollutants associated with buildings and transport, via the 'CityAir' initiative;
- minimising construction and demolition emissions through the City's Code of Practice;
- tackling emissions from idling vehicle engines;
- recognising and rewarding good practice;
- increasing public awareness of air quality; and
- monitoring the impact of measures to reduce pollution.

Financial and Risk Implications

8. The end of November 2014 monitoring position for Department of Markets & Consumer Protection services covered by Port Health & Environmental Services Committee is provided at Appendix E. This reveals a net underspend to date for the Department of £158k (9%) against the overall local risk budget to date of £1.7m for 2014/15.
9. Overall, the Director of Markets & Consumer Protection is currently forecasting a year end overspend position of £91k (3.5%) for the PH&PP Division's City Fund and City Cash services under his control. The table below details the summary position by Fund.

Local Risk Summary by Fund	Latest Approved Budget £'000	Forecast Outturn £'000	Variance from Budget +Deficit/(Surplus)	
			£'000	%
City Fund	2,337	2,428	91	3.9%
City Cash	282	282	0	0%
Total M&CP Services Local Risk	2,619	2,710	91	3.5%

10. The reasons for the significant budget variations are shown in Appendix E, which sets out a detailed financial analysis of each individual service relating to this Committee which the Director of Markets & Consumer Protection supports.
11. The better than budget forecast position at the end of November 2014 is principally due to additional income from the Pet Travel Scheme at the Heathrow Animal Reception Centre.
12. The Director of Markets & Consumer Protection anticipates that this current better than budget position will move into a deficit by year end, due to the uncertainty in CVED (Common Veterinary Entry Document) income from the closure of Thamesport and opening of London Gateway Port. It may be decided at year end to fund this deficit by additional transfers from the POAO

(Products of Animal Origin) Reserve, depending on the overall Departmental bottom line position.

Corporate & Strategic Implications

13. The monitoring of performance indicators across the Division links to all three Corporate Plan Strategic Aims (To support and promote 'The City'; To provide modern, efficient and high quality local services for the Square Mile; and, To provide valued services to London and the nation).

Consultees

14. The Town Clerk and the Chamberlain have been consulted in the preparation of this report.

Appendices

- Appendix A – Performance Management Report Period 2 2014-15
- Appendix B – Progress against Key Objectives Period 2 2014-15
- Appendix C – Enforcement Activity Period 2 2014-15
- Appendix D – Key Risks
- Appendix E – Financial Statements: Department of Markets and Consumer Protection, Port Health & Public Protection Division

Background Papers

Department of Markets & Consumer Protection Business Plan 2014-2017 and Appendix B: Port Health & Public Protection Business Plan 2014-2017
(PH&ES Committee 13 May 2014)

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**Performance Management Report 2014-15
Period Two: 1 August – 30 November 2014**

**Department of Markets and Consumer Protection
Port Health and Public Protection Division**

Progress against Business Plan Performance Indicators



	This indicator is performing to or above the target.
	This indicator is a cause for concern, frequently performing just under target.
	The indicator is performing below the target.

	All PH&PP Service Areas	Actual 2013-14		Target 2014-15	Actual 2014-15		Status
		Period 2	Period 3		Period 1	Period 2	
PI 1 * ₁	Achieve an overall sickness absence level of no more than 7 days per person by 31 March 2015, and a total of no more than 770 days (<257 days per period) across all PH&PP Service areas.	N/A	N/A	<257 days per period	287	284	
PI 2 * ₁	a) 90% of debts to be settled within 60 days.	N/A	N/A	90%	97%	97%	
	b) 100% of debts settled within 120 days.			100%	97%	99.5%	



*₁ New indicator for 2014-15

PI 1: Target based upon Full Time Equivalent (FTE) members of PH&PP staff at 31 December 2013 (no. 110). Period Two reason for underperformance: There have been several cases of long term sickness absence during this period. However, HR confirms that all sickness absence is being managed in accordance with the City Corporation's policy and procedures.

PI 2: All debtors with debts more than 120 days old are currently being chased.

	Port Health and Animal Health	Actual 2013-14		Target 2014-15	Actual 2014-15		Status
		Period 2	Period 3		Period 1	Period 2	
PI 3	Percentage of consignments of products of animal origin (POAO) that satisfy the checking requirements cleared within five days of presentation of documents/consignments.	94.03%	93.51%	95%	95.56%	94.64%	
PI 10	Less than 4% of missed flights for transit of animals caused by the Animal Reception Centre (ARC).	0.1%	0%	<4%	0%	3.3%	

PI 3: Time elapsed between receipt of documents/presentation of container to release, on electronic cargo handling system. Period 2 2014/15: 94.46% at London Gateway and 94.85% at Tilbury.

	Public Protection	Actual 2013-14		Target 2014-15	Actual 2014-15		Status
		Period 2	Period 3		Period 1	Period 2	
PI 13 * ₁	Over the course of the year, secure a positive improvement in the overall Food Hygiene Ratings Scheme (FHRS) ratings profile for City food establishments compared to the baseline profile at 31 March 2013.	N/A	Profile did not improve	Improved profile	N/A	N/A	-
PI 15 * ₂	Audit all Cooling Tower sites that are either due an inspection in accordance with HELA LAC 67/2 (rev4), City of London local priorities and local intelligence, or that have other good reason to be audited.	N/A	N/A	100%	100%*	95%	
PI 21	90% justifiable noise complaints investigated result in a satisfactory outcome.	99.5%	98.7%	90%	96.9%	92%	
PI 24 * ₁ & * ₂	Bring to a conclusion at least two major investigations into investment and commodity fraud out of Operations Addams, Wade and Currie by March 2015.	N/A	N/A	100%	N/A	N/A	-

*₁ Annual indicator

*₂ New indicator for 2014-15

PI 13: The purpose of this indicator is to show an overall improvement in the FHRS rating profile across all City food establishments by the end of the year. The target cannot be expressed as a specific percentage since any increase will indicate achievement.

PI 15: Local Authority Circular (LAC 67/2 (rev4)) is guidance under Section 18 Health and Safety at Work etc Act 1974 (HSWA). It provides LAs with guidance and tools for priority planning and targeting their interventions to enable them to meet the requirements of the National Local Authority Enforcement Code (the Code).

Period Two reason for underperformance: The inspection of one tower which was due at the end of November has been delayed until mid-December due to scheduled Primary Authority work taking precedence.

PI 21: The percentage of total justified noise complaints investigated resulting in noise control, reduction to an acceptable level and/or prevention measures; complaints may or may not be actionable through statutory action.

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Progress against Port Health & Public Protection Key Objectives 2014-2015

Ref:	Objective	Progress to date
1	Implement the Health & Safety Intervention Plan.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • Ongoing. The Plan received Committee approval on 15 May 2014. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • Ongoing.
2	Ensure a consumer focused food law enforcement program is implemented based upon the FSA's national Framework Agreement and Food Law Code of Practice.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • Ongoing. The Food Safety Enforcement Plans for the City and the London Port Health Authority received Committee approval on 15 May 2014. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • Ongoing. • The Port Health & Public Protection Enforcement Policy has been updated and the latest version was posted on the City of London website in August 2014.
3	Prepare for and implement changes arising from Service Based Reviews.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • Port Health - good progress is being made on the tasks agreed by the Assessment Panel which include use of IT for mobile working, review of charges, property matters and shared procurement for Launch fuel and maintenance with other statutory bodies. • The full submission for the service has been agreed with the Committee Chairman and Deputy Chairman. • The Chief Officer and PH&PP Director attended the Star Chamber and subsequent meetings. • Awaiting decision of Policy & Resources Committee in early September. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • The Department's Service Based Review plans were approved by the Policy & Resources Committee in early September and endorsed by the Port Health & Environmental Services Committee in November. • The Chief Officer and Port Health & Public Protection Director have briefed Public Protection Division managers and staff about the changes that will affect them and an Action Plan to implement the approved measures is being developed. • The introduction of mobile working technology for Port Health is not progressing as quickly as anticipated due to procurement issues and delays on the part of the Chamberlain's IS Division.

4	Implement and embed new legislation and adapt to revisions to existing legislation.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • Ongoing in line with the new Regulators' Code. • Regular updates made to Imported Food legislation are brought to the attention of Port Health staff so that changes may be implemented and ISO procedures updated. • New street trading legislation has been fully embedded within current policies and procedures. Members of staff have received appropriate training. Two ice cream vans have been seized and a further crackdown planned. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • Ongoing, in line with the requirements of the Regulators' Code. • The only recent legislation update for Port Health is the quarterly review of the "High Risk" products list under EC 669/2009. • The Pollution Team arranged and was joined by colleagues from the City of London Police and across the Corporation in training for the new antisocial behaviour powers in preparation for the implementation of the Anti-Social Behaviour Crime and Policing Act 2014.
5	Prepare for potential implications of new EU Animal Health legislation around importing animals as baggage rather than freight, including the possible requirement for the construction of additional facilities.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • Confirmation is awaited from the Animal Health and Veterinary Laboratories Agency (AHVLA) and the airlines that they have finalised and agreed their new processes for the importation of animals as baggage. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • Internal training at the HARC is taking place so that staff members are prepared for the implementation of the legislation in December.
6	Revise the City Air Quality Strategy to reflect the latest evidence of the impact on health, additional action required to meet air quality limit values, and the new public health responsibilities of the City Corporation.	<p>Period 1: April – July 2014</p> <ul style="list-style-type: none"> • An informal consultation is underway regarding additions to the revised Air Quality Strategy. Key aims for the new document have been put to the PH&ES Committee, Health and Wellbeing Board and Supporting London Officers Group. The revised Strategy is due to be submitted to PH&ES Committee for consideration and subsequent consultation during Period 2 (Aug-Nov 2014). • A "London Air Quality Reception" was held at Mansion House on 29 July. The event was addressed by the Lord Mayor and the Mayor of London. <p>Period 2: August – November 2014</p> <ul style="list-style-type: none"> • The Draft Air Quality Strategy was approved by the Port Health & Environmental Services Committee and public consultation is now underway. • An Air Quality Breakfast Seminar was held in the Livery Hall on 4 November with presentations from London Councils, King's College and an air quality consultant. Attendees included CoL Members and officers and members from

		<p>other local authorities.</p> <ul style="list-style-type: none">• Work continues on the Barbican and Mansell Street Citizen Science Projects, which involve residents carrying out data collection and visualisation to monitor air pollution in the City.
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Port Health & Public Protection Enforcement Activity Period 2 (August – November) 2014-15

Food Safety	2014-15 Target (where applicable)	Period 2 Total (Year to date totals are shown in brackets)
Programmed inspections	<u>Food Hygiene:</u> 1011 <u>Food Standards:</u> 372	<u>Food Hygiene:</u> 256 (521) <u>Food Standards:</u> 99 (197)
Hygiene Emergency Closures	N/A	0 (0)
Voluntary closures	N/A	3 (8)
Complaints & service requests received	N/A	102 (205)
Notices served	N/A	10 (19)
Prosecutions	N/A	0 (0)

Sampling

The Food Safety Team is an active contributor to national and regional sampling programmes which are developed with neighbouring authorities in London through the pan-London Food Co-ordinating Group, utilising advice and guidance from Public Health England and the Public Analyst.

Total Samples Taken	Microbiological samples ¹	Public Analyst samples
262	245	17

Of the total of 262 samples, 195 were found to be satisfactory and 67 unsatisfactory.

113 of the samples were taken as part of enforcement activity or investigations, with the majority being part of four separate gastrointestinal outbreak investigations.

The remaining 149 samples were taken as part of a number of national (Food Standards Agency) and pan-London co-ordinated programs including:

- **NOVAS:** a pilot study looking at norovirus contamination in food premises
- **Study 53:** swabs taken from ready-to-use 'platters' (slates, wood, etc.) used to serve food on
- **Study 54:** food hygiene in premises providing takeaway food with a FHRS² score of 3 or below

The protocols from two previous studies have also been used retrospectively to take samples:

- **Study 47:** devised at the time of the **London 2012** Olympics for poor food hygiene performers
- **Study 51:** pre-packed sandwiches from small/medium enterprises

¹ Taken for examination by the Food Examiner at the Public Health England Food Water & Environmental Microbiology Laboratory (FWEM) at Colindale

² The Food Standards Agency's national [Food Hygiene Rating Scheme](#)

Port Health & Public Protection Enforcement Activity Period 2 (August – November) 2014-15

Period 2 – Food Safety Team Highlights

- In this period there have been three separate **outbreaks** of gastrointestinal illness associated with premises within the City, one of these and a previous outbreak in July involved norovirus. Draft reports for the latter two have been prepared; the other two are still under investigation. These outbreaks are investigated with our colleagues in Public Health England and some cases with other local authorities.
- There have been three **voluntary closures** of food premises following imminent risks to health caused by issues such as pest infestations and inadequate facilities and procedures.
- The team is helping to train two of the **Smithfield Market Authorised Officers** so that they may attain their Higher Certificate in Food Premises Inspections.
- Two student Environmental Health Officers have been facilitating a project designed to gauge the level of display of **food hygiene ratings** in compliant premises (those rated 3, 4 or 5). This project is due to be completed shortly. The same project work is being replicated across other local authorities in England and is designed to support the case for mandatory display of ratings (currently in place in Wales).
- In October and November the team played a part in hosting two delegations from the PR of China's **Beijing Administration for Industry and Commerce** who received presentations on the Safety of Mobile Food Vendors, Trading Standards and Street Trading enforcement.

**Port Health & Public Protection Enforcement Activity
Period 2 (August – November) 2014-15**

Food Hygiene Rating Scheme (FHRS) – profile of food businesses in the City of London

		Hygiene Rating						Total no. of food businesses in the City included in the FHRS
		5	4	3	2	1	0	
Number (%) of food businesses	March 2013	925 (58%)	345 (22%)	171 (11%)	69 (4%)	61 (4%)	12 (1%)	1583
	August 2013	908 (56%)	378 (23%)	168 (10%)	83 (5%)	67 (4%)	25 (2%)	1629
	29 November 2013	903 (55%)	387 (23%)	172 (10%)	98 (6%)	70 (4%)	24 (2%)	1654
	31 March 2014	880 (53%)	374 (23%)	182 (11%)	104 (6%)	74 (5%)	23 (1%)	1661 <i>(incl. 24 awaiting inspection)</i>
	31 July 2014	898 (54%)	374 (23%)	174 (10%)	102 (6%)	67 (4%)	19 (1%)	1661 <i>(incl. 27 awaiting inspection)</i>
	1 December 2014	919 (55%)	380 (23%)	175 (10%)	92 (6%)	58 (4%)	17 (1%)	1675 <i>(incl. 34 awaiting inspection)</i>

'0' rated food businesses in the City

These businesses were rated '0' at 1 December 2014; some have been since been re-inspected - further information is given in the 'Details' column.

Premises	Details
28-50 Wine Workshop & Kitchen , Retail Unit, 140 Fetter Lane, London EC4A 1BT	Revisited risks removed. The next routine inspection is due shortly.
Bagelmania , 156 Salisbury House London Wall London EC2M 5QD	A routine inspection was carried out on 4 November 2014 and a FHRS rating of 4 was awarded. Visible improvements had been made on site and paperwork was complete and up to date.
Bangkok Kitchen , Guild Church Of St Mary Aldermary Watling Street London EC4M 9BW	Re-inspection is due. Confirmation has been received that issues raised have been addressed (in the production kitchen outside the borough). There should now be a wash hand basin, hand soap and sanitiser on site (this is a street stall).
Chapters Deli , Retail Unit 50 Bishopsgate London EC2N 4AJ	Weekly unannounced visits made following an initial inspection are now seeing great improvements. All staff have been trained and a separate area has been introduced for raw food. Full temperature documentation is in place: there seems to be a commitment to 'getting it right'.
Chilli Nachos , (Tinga Foods Limited), Retail Unit, 46 Moorgate, London	Ongoing interventions are being undertaken by several City of London departments. An inspection was carried out on 13 October 2014, with revisits on 22 October, 4 November and 9 December. Ongoing intervention and education is required.
Eatsies , Thavies Inn House, 3-4 Holborn Circus, London EC1N 2HA	The premises reopened following voluntary closure and was visited as part of a complaint investigation.

**Port Health & Public Protection Enforcement Activity
Period 2 (August – November) 2014-15**

	Pest issues are being dealt with. The premises is due a refit.
Go Italian Street Food , 60C Holborn Viaduct, London EC1A 2FD	The premises has been revisited and compliance sustained.
Kirin Restaurant , 10 College Hill, London EC4R 2RP	A re-rating inspection was requested following improvement in food safety management procedures; these were not sustained and the premises' FHRS rating remains a zero.
Mehek Restaurant & Bar , 45 London Wall London EC2M 5TE	The premises was re-rated following a request and a 0 score was given on 29 July. Revisits on 9 September and 1 October 2014 found compliance with the improvement notice and other issues raised at inspection.
Mumbai Square , 7 Middlesex Street, London E1 7AA	Inspected mid-September; follow up visits have been made. Compliance is not yet sustained and further enforcement action is under consideration.
My Lunch Box , Retail Unit. 6 Minories, London EC3N 1BJ	Standards are starting to improve and the owner has recently requested a re-rating inspection; this will be completed in the New Year.
Notes, Music & Coffee Ltd , City Point, 1 Ropemaker Street, London EC2Y 9AW	Revisits were made on 8 September and 15 October. Issues are progressing and improvements are visible.
Rudd's Retail Unit , 148 Queen Victoria Street, London EC4V 4BY	Improvements were seen on the revisit inspection. The next inspection is due in April 2015.
Scoffs , Thames Court, 1 Queenhithe, London EC4V 3DX	A revisit found that there are still issues on site, which are possibly from their central kitchen. The EHO met the owner on site and these issues were discussed.
Super Deli Sandwiches , 17 Widigate Street, London E1 7HP	Follow up intervention visits have been made and standards have improved; food samples were taken on the last visit and results are currently awaited.
The Cock And Woolpack Public House , 6 Finch Lane London EC3V 3NA	The premises' food safety systems have progressed. The hygiene improvement notice was complied with and checks made to see if compliance was sustained: it was by mid-September.
Zorita's Kitchen , Retail Unit, Broken Wharf House, 2 Broken Wharf, London EC4V 3DT	Notices have been complied with (addressing the wash hand basin, sink and flooring). A revisit is due to gauge progress on implementation of the in house HACCP system.

Port Health & Public Protection Enforcement Activity Period 2 (August – November) 2014-15

Health & Safety	2013-14 Annual Total	2014-15 Target (where applicable)	Period 2 Total (Year to date totals are shown in brackets)
Programmed Cooling Tower inspections	74	90	21 (43)
Other H&S Inspections	12	N/A	0 (9)
H&S Project visits	8	N/A	2 (2)
Accident and dangerous occurrences notifications	245	N/A	75 (162)
Complaints & service requests received	193	N/A	78 (128)
Notices	3	N/A	0 (0)
Prosecutions	0	N/A	0 (0)

*MST – Massage and Special Treatment

Period 2 – Health & Safety Team Highlights

- The team provided support and guidance to three City organisations and one London local authority to obtain recognition and awards under the **Mayor of London Healthy Workplaces Charter**.
- The team ran **income generating training courses** for 40 local authority health and safety enforcement staff on controlling legionella in hot and cold water systems.
- An awareness raising project on '**Falls from Height**' commenced, along with an associated Twitter campaign.
- A new **Primary Authority Partnership** on health and safety commenced with the Ornamental Aquatic Trade Association.
- An audit of a non-City Virgin Active premises was undertaken as part of the **Primary Authority Partnership** arrangement.

Period 2 – Pest Control Team Highlights

- The **Smithfield Market Pest Control Strategy** has been audited by a third party expert. The auditor's report supported the existing strategy and made some recommendations which are being implemented.
- **Thames Water** has carried out successful sewer baiting for rats in some areas of the City, and plan to make further improvements.
- A new contract was signed with **Cory Environmental** at Walbrook Wharf following which the team quickly brought the significant rat problem there under control.
- A **bed bug** problem in a City of London estate premises was brought under control.
- 13 **rat sightings / complaints** in the City were successfully resolved.

**Port Health & Public Protection Enforcement Activity
Period 2 (August – November) 2014-15**

Trading Standards	2014-15 Target (where applicable)	Period 2 Total (Year to date totals are shown in brackets)
Inspections and visits	N/A	25 (74)
Complaints & service requests received	N/A	987 (2202)
Home Authority referrals	N/A	20 (421)
Consumer safety notifications	N/A	0 (2)
Acting as a responsible authority for Licensing Applications	N/A	28 (59)
Prosecutions	N/A	0 (0)

Period 2 – Trading Standards Highlights

- **Operations Addams and Curie**, which are large fraud investigations, are both proceeding well; arrests have been made.
- **Operation Broadway**, a proactive operation targeting and disrupting boiler rooms based in The City of London, and on which the Team is working with the City of London Police, is receiving good feedback to date.
- In October and November the team played a part in hosting two delegations from the PR of China's **Beijing Administration for Industry and Commerce** who received presentations on the Safety of Mobile Food Vendors, Trading Standards and Street Trading enforcement.

Port Health & Public Protection Enforcement Activity Period 2 (August – November) 2014-15

Pollution	2014-15 Target (where applicable)	Period 2 Total	% Noise complaints resolved	Notices served	Prosecutions
Complaint investigations, noise	N/A	297 (651)	92.3%	1 (4)	0 (0)
Complaint investigations, other	N/A	9 (41)	N/A	0 (0)	0 (0)
Licensing, Planning and Construction Works applications assessed	N/A	342 (651)	N/A	3 S61 CoPA* 2 EPA* (9)	N/A
No. of variations (to construction working hours) notices issued	N/A	276 (449)	N/A	N/A	N/A

* COPA: Control of Pollution Act 1974. S61: Prior consent for work on construction sites.

* EPA: Environmental Protection Act 1990. 1x vehicle alarm; 1x noise from tree falling.

Period 2 – Pollution Team Highlights

- **Crossrail** Tunnel Boring Machine (TBM) Elizabeth (east bound tunnel) is predicted to enter the vicinity of the Barbican Estate around the beginning of February 2015 and TBM Victoria (west bound tunnel) is due around the end of February 2015. The team has been working with Crossrail to reduce any potential impacts on the Barbican Concert Hall, the Barbican Centre and residents.
- A number of **private water supplies** that fall within the scope of the Private Water Supplies Regulations 2009 have been identified. Two locations were found to be non-compliant and following intervention have ceased use of the borehole water. The team is on target for compliance with its responsibilities under the Regulations which have to be fully implemented by the end of December 2014.
- The team were joined by colleagues from the City of London Police and other Corporation departments for training on the new **antisocial behaviour powers** in preparation for the implementation of the Anti-Social Behaviour Crime and Policing Act 2014.
- The draft **Contaminated Land Strategy 2015–2020** has been released for internal consultation.
- Four **Chinese visitors** from the Tianjin Environment Monitoring Centre, based in the city of Tianjin, China, visited the air quality monitoring site in the playground of the Sir John Cass's Foundation Primary School in the City of London. The team showed the visitors equipment which monitors particulate matter and nitrogen dioxide and explained how the data is processed and used by the City. The Chinese delegates are hoping to set up a team to cover air quality modelling, forecasting and monitoring in the City of Tianjin on their return to China.
- The **Bank Station Upgrade** project is progressing. Several objections have been received with preparations being made for the public enquiry to take place in Spring 2015.
- The **Thames Tideway Tunnel** project is progressing with two City locations selected for development of trigger action plans.

**Port Health & Public Protection Enforcement Activity
Period 2 (August – November) 2014-15**

Animal Health & Welfare	2014-15 Target (where applicable)	Period 2 Total	Warning letters	Notices served	Prosecutions
		(Year to date totals are shown in brackets)			
Animal Reception Centre					
Throughput of animals (no. of consignments)	N/A	7,460 (15,285)	19 (39)	0 (0)	6 (9)
Animal Health					
Inspections carried out*	N/A	91 (248)	0 (1)	15 (41)	0 (0)
*Due to the legislation, most of the Animal Health licensing inspections are carried out at the end of the calendar year and figures will, therefore, fluctuate across quarters.					

Period 2 – Animal Health & Welfare Highlights

- The Animal Health team is in the process of carrying out criminal investigations on individuals involved in the **illegal importation of puppies** from Eastern Europe. Some of these investigations are in tandem with other local authorities.
- The Animal Health team has forged good links with the Hungarian veterinary authorities in attempting to clamp down on **forged pet passports** and it is hoped that this will bear fruit next year.
- The Animal Health team has signed a **Primary Authority Partnership (PAP)** agreement with the Ornamental Aquatic Trade Association, whose retail members are licensed under the Pet Animals Act. This is the first such PAP with a pet trade organisation and it has received considerable ministerial support at the All Parliamentary Group on Animal Welfare.
- At the beginning of 2014, two Romanian nationals smuggled some extremely **rare Iguanas** from the Bahamas. There are apparently only about 400 of these animals left in the wild. They were caught whilst transiting Heathrow by Border Force. HARC had the responsibility of looking after these animals whilst their return to the Bahamas was arranged: this eventually took six months. The Bahamian High Commissioner took great personal interest in the whole saga. All of the iguanas made it back to the Bahamas courtesy of VIP treatment by British Airways.
- The **Apprentice Animal Attendants** taken on at the HARC over the past few years have been excellent, so the City of London's Apprenticeship scheme retains the Team's wholehearted support. There are currently two new Apprentices who are proving to be as good as their predecessors.
- HARC has signed an agreement with the **University of Surrey Vet School**, which will see mutual benefits accruing as time moves on. The Vet School is brand new and opened in October this year. This gives HARC access to the University facilities and the students have access to HARC to do work experience and undertake projects.
- Two members of HARC staff have been given responsibility for the HARC's **social media** presence, content and activity: the responses have been overwhelmingly positive so far. See our Facebook page!
- The **Pet Travel Scheme** continues apace and provides the bulk of the workload at HARC. Emotional Support Animals have increased by around 35% since last year. They take a lot of officer time to deal with, but they also provide some good income.

**Port Health & Public Protection Enforcement Activity
Period 2 (August – November) 2014-15**

Port Health	2014-15 Target (where applicable)	Period 2 Total	Cautions	Notices served	Prosecutions
		(Year to date totals are shown in brackets)			
Food Safety inspections and revisits	N/A	37 (45)	0 (0)	0 (0)	0 (0)
Ship Sanitation Inspections and Routine Boarding of Vessels	N/A	40 (66)	0 (0)	0 (0)	0 (0)
Imported food Not of Animal Origin -document checks	N/A	2,582 (7,600)	0 (0)	86 (168)	0 (0)
Imported food Not of Animal Origin - physical checks	N/A	711 (1,183)	0 (0)	0 (0)	0 (0)
Number of samples taken	N/A	117 (204)	N/A	N/A	N/A
Products of Animal Origin Consignments – document checks	N/A	3,432 (6,629)	0 (0)	30 (39)	0 (0)
Products of Animal Origin Consignments – physical checks	N/A	1,346 (2,456)	0 (0)	3 (6)	0 (0)
Number of samples taken	N/A	84 (167)	N/A	24 (50)	N/A

Period 2 – Port Health Highlights

- The operators of **London Gateway Port** have announced that three new shipping lines will be calling at the Port with effect from mid November 2014, and they predict a doubling of overall throughput of containers by this time next year. Whilst not all of the additional containers coming through the port will include consignments of food, they will cause an increase in the number of checks that Port Health staff are required to carry out. To deal with the predicted increase, further members of staff are being recruited so that relevant training and familiarisation with the new port environment can be completed in time for the onset of the additional workload.
- Further work is underway in conjunction with the IS Division to develop **mobile working technology** for use by Port Health staff. The benefits of this will include the ability to more quickly notify other agencies and importers of the outcome of inspections. This, in turn, will enable the trade to deal quickly with their consignments and capitalise on the arrangements London Gateway has in place to provide swift turnaround of containers.

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Port Health and Public Protection Key Risks (December 2014)

The table below shows a selection of our key risks which form part of our Departmental Risk Tracker.

Risk No.	Risk	Risk Owner	Existing Controls	Current Risk				Planned Action	Target Risk		
				Likelihood	Impact	Rating	Direction		Likelihood	Impact	Rating
M C P 4	Risk of serious injury to staff and service users due to constrained space for vehicle movement which, in the event of a serious accident/fatality, could affect the operation and sustainability of the service.	Rob Quest HARC	The TOP X risk priority system and a near miss reporting system is in place. Banksman employed at HARC. All accidents fully investigated and any follow up actions implemented.	Possible	Major	A	↔	A review of traffic management is currently being undertaken and will be formally completed by the end of March 2015.	Unlikely	Major	A
M C P 5	Failure by enforcement officers to act in accordance with the current, Member-approved PH&PP Policy Statement on Enforcement, statutory requirements and Government guidance leading to reputational risk and potential financial loss.	Jon Averbs Port Health & Public Protection	Competent enforcement officers; clear policies, procedures and decision making; monitoring of enforcement officers.	Unlikely	Major	A	↔	Regular review of policies and procedures. Routine CPD training of all staff to minimum professional levels.	Rare	Major	G

Risk No.	Risk	Risk Owner	Existing Controls	Current Risk				Planned Action	Target Risk		
				Likelihood	Impact	Rating	Direction		Likelihood	Impact	Rating
M C P 6	Failure to meet Air Quality limit values in the City by the prescribed dates set by the EU which could result in a fine of unknown amount.	Jon Aaverns	The current systems in place allow the City to demonstrate that it is taking sufficient effective action to help the government and the GLA to meet air quality limit values.	Likely	Major	R	↔	The City is working with the GLA and other Local Authorities, organisations and partnerships to address pan-London issues which impact air quality in the City and implementing actions identified within the City of London Air Quality Strategy (recently reviewed and currently out for consultation) including: <ul style="list-style-type: none"> •Encouraging City businesses to reduce emissions via CityAir •Minimising construction and demolition emissions through the City's Code of Practice •Tackling emissions from idling vehicle engines •Recognising and rewarding good practice •Increasing public awareness of air quality •Monitoring the impact of measures to reduce pollution 	Possible	Major	A
M C P 8	Loss of quarantine licensing due to breach of regulations or legislative change. This would result in the closure of the Border Inspection Post facility to imported animals, causing financial loss and negative publicity for the City.	Jon Aaverns HARC	Current procedures reflect regulatory requirements and are actively managed.	Unlikely	Major	A	↔	Undertake annual review of procedures and Defra requirements. Continue consultation with regulatory bodies on new legislation. Ensure that contingency plans cover risks that could affect the quarantine function.	Rare	Major	G

Risk No.	Risk	Risk Owner	Existing Controls	Current Risk				Planned Action	Target Risk		
				Likelihood	Impact	Rating	Direction		Likelihood	Impact	Rating
M C C P 9	Outbreak of Legionnaires disease (Legionella sp.) in the City associated with a cooling tower situated within the City of London, the statutory monitoring of which is the responsibility of the City.	Jon Averns Public Protection	The team has considerable knowledge and experience in this field and has provided training for many other enforcement officers across the country. Over 100 premises are audited each year with the frequency of each inspection based upon a national risk rating scheme which takes into account how those responsible are managing health & safety risks.	Unlikely	Major	A	↔	Conduct regular inspections (frequency dependent upon risk). Independent audit by Environmental Health Officers looking at all aspects of the water risk management systems in place.	Rare	Major	G
M C P 1 2	Inadequate Financial Management in respect of Agents' "unsecured" debts.	Mike Seton Port Health	Existing controls in relation to agents require modification.	Possible	Major	A	↔	Additional controls will be put in to minimise the risk. For future agents a scheme will be developed linked to a security deposit.	Rare	Minor	G
M C C P 1 3	Significant delays to maintenance or repairs of equipment and facilities, causing operational difficulties and risk of reputational damage and financial loss.	Rob Quest HARC	City Surveyor's PFMs have been dealing directly with Mitie to address known problem areas. Local management are regularly in touch with PFMs to press for remedial action.	Possible	Major	A	↔	Senior Managers in both M&CP and CS have agreed on suitable arrangements for future maintenance operations.	Unlikely	Minor	G

Ratings	Risk Status	Control Evaluation
R - Red	High risk, requiring constant monitoring and deployment of robust control measures	Existing controls are not satisfactory
A - Amber	Medium risk, requiring at least quarterly monitoring, further mitigation should be considered	Existing controls require improvement/Mitigating controls identified but not yet implemented fully
G - Green	Low risk, less frequent monitoring, consideration may be given to applying less stringent control measures for efficiency gains	Robust mitigating controls are in place with positive assurance as to their effectiveness

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**Port Health & Public Protection Division
(Income and favourable variances are shown in brackets)**

	Latest Approved Budget 2014/15 £'000	Budget to Date (Apr-Nov)			Actual to Date (Apr-Nov)			Variance Apr-Nov £'000
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	
Port Health & Environmental Services (City Fund)								
Coroner	52	35	0	35	31	0	31	(4)
City Environmental Health	1,594	1,317	(254)	1,063	1,292	(215)	1,077	14
Pest Control	68	107	(62)	45	99	(62)	37	(8)
Animal Health Services	(672)	1,415	(1,863)	(448)	1,380	(1,989)	(609)	(161)
Trading Standards	269	192	(13)	179	183	(12)	171	(8)
Port Offices & Launches	1,026	1,897	(1,213)	684	1,877	(1,173)	704	20
Meat Inspector's Office (City Cash)	282	190	(2)	188	183	(6)	177	(11)
TOTAL PORT HEALTH & ENV SRV COMMITTEE	2,619	5,153	(3,407)	1,746	5,045	(3,457)	1,588	(158)

Forecast for the Year 2014/15			Notes
LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	
52	51	(1)	
1,594	1,620	26	
68	64	(4)	
(672)	(675)	(3)	1
269	266	(3)	
1,026	1,102	76	2
282	282	0	
2,619	2,710	91	

Notes:

1. **Animal Health Service** - favourable forecast to date is based on current activity and previous years performance for increased income for passports for pets.

2. **Port Offices & Launches** - due to the uncertainty in CVED's (Common Veterinary Entry Document) income from the closure of Thamesport and the uncertainty of the full effects of London Gateway, the outturn is likely to change in the coming months. Further shortfalls in CED (Common Entry Document) income and new rates charges for Border Inspection Posts (for which liability is being reviewed by the Rating Officer and will be passed on to Port Operators if possible), have resulted in an overall deficit position. The POAO (Products of Animal Origin) transfer from reserve is currently required to pay for additional staff only. Should the overall MCP Departmental City Fund outturn forecast for the year remain in deficit, then it may be used further to balance the outturn for the Department.

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Agenda Item 8

Committee(s):	Date(s):
Port Health & Environmental Services	20 January 2015
Subject: Animal Reception Centre - Heathrow Airport: Annual Review of Charges	Public
Report of: Director of Markets & Consumer Protection	For Decision

Summary

The purpose of this report is to seek approval of the increase to be applied to the Schedule of Charges in respect of services provided at the Heathrow Animal Reception Centre (HARC), for the forthcoming financial year 2015/16.

The continued increase in throughput following the changes to the legislation in 2012, and a moderate overall increase in fees for 2015/16 should mostly offset increased costs, although it is anticipated that the service will operate at a deficit in 2015/16 due to a number of one-off costs for building works.

Recommendations

- The charges included in the Appendices to this report be adopted and applied at the HARC, with effect from 1 April 2015 or as soon as it is practicable thereafter.
- in the event that your Committee agrees to the recommendation contained in paragraph (a) it is further RECOMMENDED that the proposed Byelaws contained in Appendix A.1 to this report are approved and that it be recommended to the Court of Common Council that the Byelaws be made and that the Comptroller and City Solicitor be instructed to seal the Byelaws accordingly.

Main Report

Background

1. The charges for holding animals and provision of other services at the Heathrow Animal Reception Centre (HARC) are due to be reviewed towards the end of the financial year to enable an appropriate variation to be applied with effect from the following April. This advance consideration is necessary because the major proportion of the charges is in respect of quarantine animals and allied services and has to be introduced as an “additional byelaw” to the principal byelaws for the Centre. This takes somewhat longer than a more simplistic, discretionary fee increase. The second, smaller element of the charges is not byelaw controlled and relates to non-quarantine (export and boarding) charges but for practical and operational reasons the two are dealt with together.

2. The funding review in 2011 agreed that the facility should aim to achieve full cost recovery within five years, and this was achieved in 2011/12 (with the exception of one-off capital charges incurred in that year), with a small surplus in 2012/13 and 2013/14, where the surplus was £83,000. The budgeted outturn for 2014/15 is a deficit of £56,000, although a modest surplus may be achieved if throughput remains high for the remainder of the year.
3. The main source of income at HARC, the Pet Travel Scheme, is a non-statutory function and is thus open to competition from commercial enterprises. Following a period of substantial fee increases to ensure a move towards full cost recovery, the last three years' increases have been kept to around the rate of inflation (see point 12 to this report).

Current Position

4. From 1 January 2012 the UK harmonised its rules with the rest of the European Union for the importation of dogs, cats and ferrets, as the previous derogation to the rules expired on 31 December 2011. The new arrangements make it extremely easy for people to bring their animals in from 'listed countries' (these are the countries that were in the Pet Travel Scheme prior to 1 January 2012 and are those deemed rabies free, or with good rabies controls in place) and allows the importation of animals from 'un-listed countries', (i.e. the rest of the world) without having to undergo six months quarantine on arrival. The process for the rest of the world is similar to the process for 'listed' countries' prior to 1 January 2012.
5. Thus, there is now a dual set of requirements. For 'listed countries', all that is required is a microchip, vaccination against rabies, a wait of 21 days, and then the animal can travel. For un-listed countries, there is a requirement for a microchip, vaccination, a blood test 30 days after vaccination and then a three month wait before travel. This is similar to the former scheme, except that the wait has come down from six months to three months. This consolidates the old legislation and makes very few changes to the current regime. The changes made since the introduction of the Pet Travel Scheme in 2003 have now been consolidated into new EU regulations which have been enacted by an amendment to the UK legislation, which came into force on 29/12/14.
6. Trade rose 5% during the course of the 2013/14 financial year. Expenditure budgets at the ARC have risen over the past two years to reflect the increased throughput, which has necessitated greater use of consumables (food, bedding etc.) and recruitment of additional staff. Staffing levels are now correct for the current throughput. The income for Animal Health during 2014/15 was originally projected as £2.5M with the revised estimate being £2.675M.
7. Current budgeted income for Animal Health in 2015/16 is £2.53M, and the proposed increases in charges in this report should generate additional income of around £65,000. After taking into account this additional income the overall projected net outturn for 2015/16 is a deficit of £420,000. This is due particularly to the City Surveyor's planned Additional Works Programme of repairs and maintenance of £235,000 for 2015/16 which are one-off in nature and are a result of work necessary following the acquisition of the freehold from BAA. However, whilst income is dependent on throughput and is not guaranteed, the deficit would be further reduced by around £150,000 if trade continues at the

same level as in 2014/15. The underlying deficit excluding one-off costs will then be reduced to around £35,000.

Proposals

8. Having regard to the continuing need to balance and maximise the HARC income against the danger of reducing the customer base at the Centre, I propose that the HARC Schedule of Charges is amended as shown in Appendix 1.
9. I have only recommended a moderate increase in some fees this year as there is a need to retain competitiveness, and the increase will move the service closer to its target break-even position during 2015/16. Annual inflation is currently circa 2.1% and the overall effect of the recommended increase in fees is circa 2.5%
10. The Comptroller and City Solicitor will prepare the necessary revised Byelaws that reflect the proposed charges as contained in Appendix 1.

Implications

11. The Comptroller and City Solicitor has been consulted and comments:

“The statutory provision under which these charges are now made is Section 30 of the City of London (Various Powers) Act 1987 (which was an enactment removing the need for Ministerial approval of the HARC Byelaws), which provides ... “the charges imposed by such Byelaws shall be such as to secure so far as is possible, that taking one year with another, the aggregate amount raised by such charges is equivalent to the reasonable costs incurred by the Corporation in operating the Animal Reception Centre”. The need for increases to be reasonable is especially important here, since, unusually, the Byelaws machinery which implements the new charges is not subject to any public notification procedure or to confirmation by the appropriate Minister”.

12. There is the potential for competition at Heathrow for the Pet Travel Scheme (PETS) as this part of our operation is not a statutory function. The legislation makes the carriers (in our case airlines), responsible for checking PETS. At Heathrow Airport, the City Corporation has negotiated Service Level Agreements with all the airlines that are currently in PETS, but this does not mean that a private organisation could not enter this ‘market’ by undercutting HARC fees. There is therefore a need to keep charges competitive.

Conclusion

13. Changes to fees in previous years have resulted in the Animal Health Service increasing its income, and the fees that are proposed for 2015/16 should offset some of the increase in costs that have led to the service operating at a deficit.

Appendices: Appendix 1, Additional Byelaws relating to Heathrow Animal Reception Centre, to incorporate revised charges for 2015/16

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ADDITIONAL BYELAWS RELATING TO THE HEATHROW ANIMAL RECEPTION CENTRE

BYELAWS made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Alderman and Commons of the said City in Common Council assembled in pursuance of Sections 42 and 43 of the Markets and Fairs Clauses Act 1847 as applied by Section 54 of the Animal Health Act 1981 with respect to the Heathrow Animal Reception Centre, London.

In these Byelaws unless the context otherwise requires “the Principal Byelaws” means the byelaws made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Alderman and Commons of the said City in Common Council assembled on 1 July 1976 and confirmed by the Minister of Agriculture, Fisheries and Food on 12 November 1976.

From the date of coming into operation of the Byelaws the Additional Byelaws made by the Mayor and Commonalty and Citizens of the City of London acting by the Mayor, Aldermen and Commons of the said City in Common Council assembled on 6 March 2014 (and sealed on 31 March 2014) shall be repealed and the following Schedule shall be substituted for the Schedule to the Principal Byelaws.

SCHEDULE

PART I

(2014 charges quoted in bracket where changes are proposed)

Minimum charge for any one consignment £165 (£160)

ANIMALS CHARGE PER CONSIGNMENT

1. Mammals	£165 (£160) for up to 24 hours	£52 (£51) per day or part thereof after 24 hours
2. Reptiles	£165 (£160) for up to 24 hours	£190 (£185) per day or part thereof after 24 hours

Transit commercial reptile consignments should be booked through to have a maximum stay at Heathrow of 24 hours. Any transit commercial reptile consignments that stay more than 24 hours and require transferring from their containers will incur the additional special handling charge detailed below.

Additional special handling for any consignment	£190 (£185) minimum per consignment	£58 (£56) per day or part thereof after 24 hours
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3. Birds £58 (£56) per box per day £165 (£160) minimum charge

Transit commercial bird consignments should be booked through to have a maximum stay at Heathrow of 36 hours. Any transit commercial bird consignments that stay more than 36 hours will be charged at £37 (£35) per box per day, or part thereof.

Pet birds £40 per bird for up to 24 hours.

Bird Quarantine £330 - £1135 (£360-£1135) plus laboratory testing fees.
Fees are dependent on size of consignment and housing requirements.

Faecal Sampling and Bird Autopsy costs as per current DEFRA rates. Larger consignments to be negotiated see Part 2, Section 6

4. Fish/Aquatic £1.75 (£1.70) per box £30 (£30) minimum charge
**Invertebrates/Semen/
Fish and Bird Eggs**

5. Cats and Dogs under the Pet Travel Scheme

PETS originating in the E.U. (including those countries listed in Annex 2 of part 1 to Commission Implementing Regulation (EU) 577/2013) will be charged a fee of £40 (£39) per animal in addition to the collection charge of £75 (£70) (see Part 2 section 5).

PETS originating outside the E.U. will be charged normal rates as in 1 above for the first animal, i.e. £165 (£160) and, where the consignment consists of more than one animal, a fee of £40 (£39) per animal thereafter.

PETS checked at aircraft (Assistance Dogs) £200 (£200) plus 1 hour collection charge £150 (£140) = £350 (£340) and, where the consignment consists of more than one animal, a checking fee of £40 (£39) per animal thereafter.

A surcharge of £600 will be added to the above for any transit consignment that has landed without an "OK to forward" from the on-going airline.

6. Security

A charge of £18 (£16) will be made in respect of any consignment which requires security screening prior to leaving the ARC.

7. Not on Board

Requests for collection of animals from aircraft which are subsequently not found on board will be charged at normal collection charge (see Part 2, Section 5).

Hillingdon London Borough Agency

To carry out all animal welfare inspections at export accommodation within Heathrow Airport - £10,600 per annum.

Committee(s):	Date(s):
Port Health and Environmental Services	20 January 2015
Subject: Street Trading Update	Public
Report of: Director of Markets and Consumer Protection	For Information
<p><u>Summary</u></p> <p>The City of London (Various Powers) Act 2013 has made changes to the long established street trading regime within the City of London. The City Corporation has the authority to issue temporary street trading licences so that commemorative and seasonal events will be able to include a street trading element but this has not been utilised to any great extent so far.</p> <p>The strengthened powers of enforcement against illegal street trading to facilitate illegal sales and vehicles, such as ice cream vans and nut-sellers carts, being subject to seizure appears to have had an effect in reducing the amount of this activity in the City in 2014.</p> <p>This report sets out the progress made with the use of the legislation seeking any comments and is for the Committee to note.</p>	

Main Report

Background

1. A report was considered by the Port Health and Environmental Services Committee on 11 March 2014 outlining the main changes introduced by the City of London (Various Powers) Act 2013. The present report is intended to update the Committee on operational use of the law by City Officers with respect to temporary and illegal street trading.
2. The City's first Street Trading Policy was agreed by the Port Health and Environmental Services Committee on 13 May 2014.
3. Prior to the 2013 Act the only street trading permitted in the City of London was in part of Middlesex Street and only on Sunday mornings. Under the new measures, the City Corporation may issue temporary street trading licences for periods of up to 21 days in any area of the City of London other than Middlesex Street. It remains the view of the City Corporation that street trading is generally not suitable within the City of London.

4. Where a temporary market is proposed, the Act provides for one person to apply on behalf of a number of traders. Provision is made by the Act for charging of fees for applications for and grant of temporary licences and for the imposition of licence conditions as to charges and the recovery of expenses.
5. A new seizure power applies to goods being unlawfully sold, and to equipment and vehicles used by unlawful street traders. This enables, for example, an ice cream van operating in the City to be seized. Prior to the powers being exercised, the Act requires prescribed training for Officers, the publication of a Street Trading Policy and an enforcement policy which was completed prior to the powers being exercised. A report confirming previously delegated powers for Officers carrying out this work was noted at the 16 September Port Health and Environmental Services Committee.

Current Position

6. A prohibition on street trading in the City of London, other than in Middlesex Street, has been in force for many years. The 2013 Act liberalises the arrangements so as to permit street trading to take place for temporary periods in defined areas.
7. Although there has been sporadic interest in various ideas for markets and street trading in the City, to date only two events have applied for and been given temporary trading licences for the following events:
 - street trading associated with the Smithfield Nocturne cycling event on 7 June 2014 and;
 - street trading associated with the Tour de France as it passed through the City on 7 July 2014.
8. In the 12 months to July 2014 the City took 53 separate prosecutions against a trader and her associates who had taken the place of Piccadilly Whip, the ice cream vending company against which an injunction was successfully sought. Despite verbal and written warnings of the new powers the new trader continued to operate in the City.
9. On 14 July the City first exercised its new powers to seize an ice cream van in Knightrider Court. Subsequently it was agreed to return the vehicle in exchange for an undertaking that neither the trader, her family, nor her associates would trade any further in the City. This leaves us in a very strong position to seek forfeiture of the vehicles if they do return. So far this has proved effective and, despite the improved weather from July onwards, significantly fewer ice cream vans were sighted in the City during the remainder of 2014. The loss of trade and disruption to business caused by seizure and the prospective replacement costs (up to approximately

£70K for a new vehicle) are real disincentives. There has been no use of the trading spot in front of St. Pauls since the powers came into force and very little illegal street trading overall compared to previous years.

10. In the same way as Piccadilly Whip was replaced by another trader and associates, other ice cream vans started appearing in the City following the removal of this second trader. A particularly persistent vehicle named 'Captain Scarlet' was warned several times. Despite this it reappeared in the City and, in a joint Licensing Team/City Police operation, it was seized on 31 July in Distaff Lane (see picture in Appendix I). As the owner had not previously been prosecuted we returned the vehicle after 3 days as the legislation requires.
11. Occasional sightings were made of the same vehicle and on Sunday 21 September it was again seized in Distaff Lane. As the trading owner was subject to prosecution action we were able to obtain an undertaking on this occasion as described in paragraph 9 above. The vehicle was returned on 1 October. We have subsequent intelligence of the vehicle occasionally stopping to trade on London Bridge (positioned so as to escape rapidly into traffic if City Enforcement or City Police Officers are spotted by the trader) but this appears to have been very limited in extent.
12. The second category of illegal street traders in the City has been nut-sellers, primarily on the northern approach to and on Millennium Bridge. Street Environment Officers from Department of Built Environment and our Licensing Officers have warned and moved off the traders when they have been reported or during sporadic/planned operations (see picture in Appendix II). There appears to have been significantly less trading after summer 2014.
13. Following the use of seizure powers against ice cream traders, nut sellers were given a final warning during a planned operation on 26 October 2014. Subsequently, in a joint Licensing Team/City Police operation, two separate nut-sellers carts were seized on 30 November 2014 from Millennium Bridge and St. Peter's Hill. Both carts were returned within three days, again in return for written undertakings to not trade again in the City. Checks made on site up to Christmas show this to have been effective so far.
14. Further operations with the City Police have been agreed in principal and will be arranged as jointly gathered intelligence demonstrates a need for further enforcement.

Corporate & Strategic Implications

15. The Street Trading Policy and the introduction of temporary street trading in the City of London meets one of the City Corporation's aims, as stated in

the Corporate Plan 2013-2017, ‘To provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes’.

16. It also meets one of the five key policy priorities KPP2, in that it seeks to ‘support and promote the international and domestic financial and business sector’.

Conclusion

17. The new powers provided for temporary street trading have not been utilised to any great extent so far despite a considerable number of general enquiries. During the first year of their use, the new powers for seizure appear to have been much more effective than those previously available, which required prolonged and expensive legal actions, in deterring illegal trading within the City as seen by the significantly reduced impact of ice cream trading.

Appendices

Appendix I – Seized Ice Cream Vehicle

Appendix II – Nut Sellers Cart

Background Papers:

Port Health & Environmental Services Committee Report 11 March 2014: ‘City of London (Various Powers) Act 2013 London Local Authorities and Transport for London (No. 2) Act 2013’

Port Health & Environmental Services Committee Report 13 May 2014: ‘Street Trading Policy’

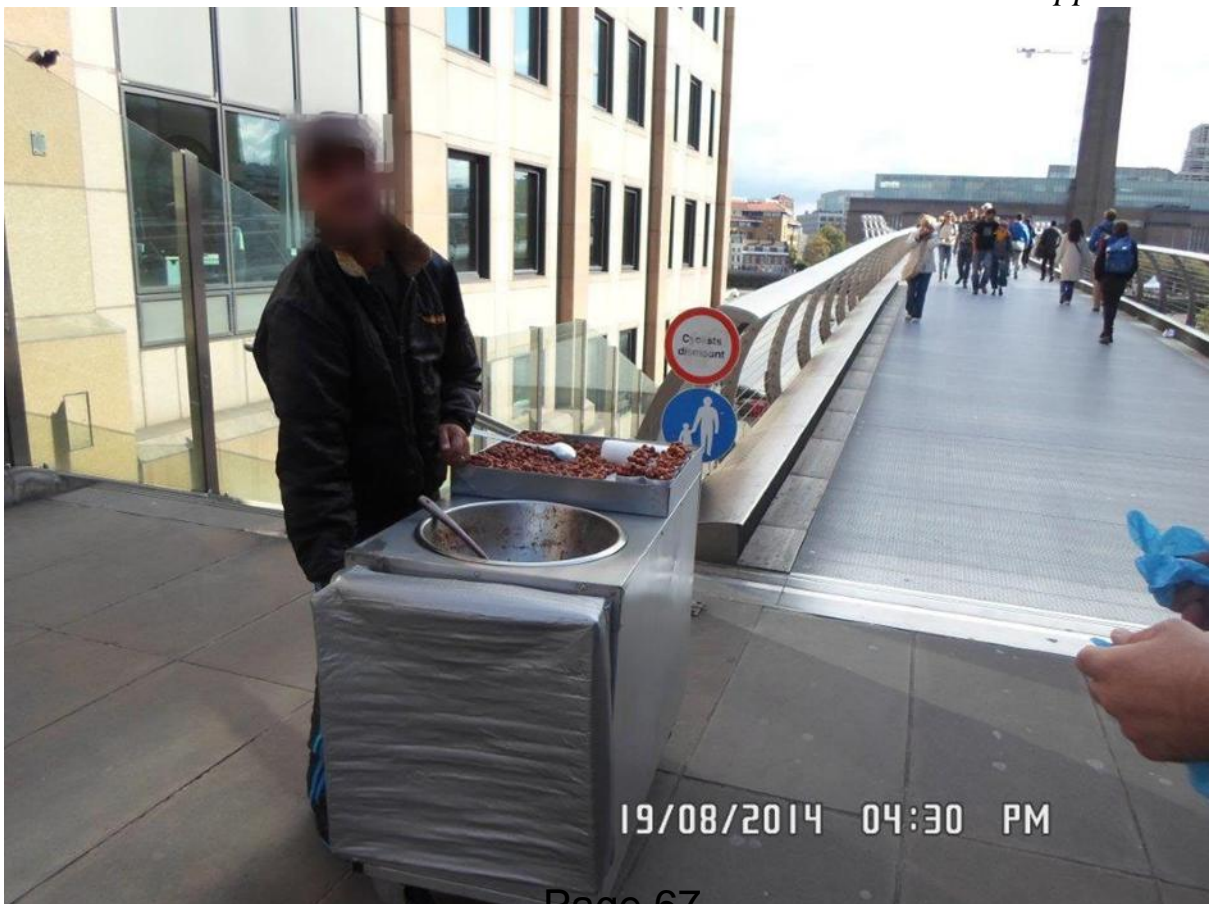
Port Health & Environmental Services Committee Report 16 September 2014: ‘Report of urgent Actions between meetings’ (to confirm delegation of powers to Director of Markets and Consumer Protection regarding City of London Various Powers Act 1987 (as amended))

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Appendix I



Appendix II



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Committee(s):	Date(s):
Port Health & Environmental Services	20 th January 2015
Subject: Department of the Built Environment, Business Plan Progress Report for P2 2014/17 (August - November)	Public
Report of: Director of the Built Environment	For Information
Summary	
<p>This report sets out the progress, relevant to the work of this Committee, made during P2 (August - November) against the 2014/17 Business Plan. It shows what has been achieved, and the progress made against our departmental objectives and key performance indicators.</p> <p>At the end of November 2014 the Department was £183k (4%) underspent against the local risk budget to date of £4.6m, over all the services now managed for the Port Health & Environmental Services Committee. Appendix B sets out the detailed position for the individual services covered.</p> <p>Overall I am forecasting a year end underspend position of £106k (1.5%) for my City Fund services.</p>	
Recommendation(s)	
Members are asked to:	
<ul style="list-style-type: none"> • note the content of this report and the appendices • receive the report 	

Main Report

Background

1. The 2014-17 Business Plan of the Department of the Built Environment was approved by this committee on 13th May 2014.

Key Performance Indicators and Departmental Objectives

2. During the period of this Business Plan, my management team are monitoring five Key Departmental Performance Indicators (KPIs) (Appendix A) relevant to the work of this committee. Performance against the departmental key performance indicators is good with those not meeting their targets being actively managed.

3. The KPI 192 is the only one of the five key indicators which is performing below target. The decrease in recycling rate is due to new, more stringent, requirements now applying to materials Recovery Facilities (MRFs) as previously reported. This has meant that some of the material collected for recycling has not met new contamination limits and has therefore rather than being processed for recycling has been sent for disposal through the Energy from Waste plant at Belvedere.
4. Officers are currently closely examining all waste streams to establish the causes of contamination and a detailed report on findings and remedial action will be brought to your next Committee.
5. KPI 195 reflects the standard of cleanliness in the square mile. The assessment is made independently by Keep Britain Tidy who continue to report high standards of cleanliness. This performance has been recognised by the City being awarded runner-up in the Chartered Institute of Waste Management's prestigious Clean City Awards (medium population category)
6. Approximately 27% of the departments FOIs have been focused on the work of this Committee, predominately questions around recycling and waste collection levels.

Public Conveniences

7. The introduction of barriers and charging at Royal Exchange (Bank) and Eastcheap commenced in March of this year. The income generated against the projected income has been mixed with Eastcheap generally on target and Royal Exchange (Bank) below target. Work is been undertaken which, alongside the TNS survey work, has identified the need to further improve sign posting to the facilities. As a result of the hugely popular poppy attraction at the Tower of London in the run up to Remembrance Day, the income at Tower Hill public conveniences is exceeding the income target profile. The attendants there have done a fantastic job keeping the facilities up to standard whilst dealing with the increased footfall and are to be commended.
8. Much work in this period has been focused on the Service Base Review savings proposals, with Officers producing an alternative package to that originally proposed which delivers the same value of savings but reduces the impact on front line provision. This report was presented to your Committee and agreed in November. Officers are now developing an implementation plan, which will include the findings of the TNS toilet satisfaction survey, to deliver the savings in line with the Service Based Review dates stated in the November report.
9. As demonstrated at the November Committee, we are in the development stages of an augmented public conveniences app for smart devices to assist in finding the locations and nearest facilities. This was well received by Members who viewed it.

Financial and Risk Implications

10. The end of November 2014 monitoring position for services for Port Health & Environmental Services Committee is provided at Appendix B. This reveals a net underspend to date for the Department of £183k (4%) against the overall local risk budget to date of £4.6m for 2014/15.
11. I am forecasting a year end underspend position of £106k (1.5%) for my City Fund services.
12. The reasons for the significant budget variations are detailed in Appendix B. The better than budget position at the end of November 2014 is principally due to reduced contract spends on waste disposal services; and savings on Public Conveniences due to reduced salary costs as a result of the decision to end extended opening hours, plus additional barrier income generated at Tower.

Risk Management

13. All Business risks have been reviewed in accordance with corporate policy. A summary of those relevant to the work of this Committee can be found in Appendix C.
14. No new business risks have been identified. Additionally there are no changes to the mitigated or unmitigated impact or likelihood score of any risk.
15. A summary of changes to existing risks is show below.

Risk Title	Change Summary
A fatal road accident to a member of staff etc.	Policy has been agreed by COG and HR are now leading on implementation.
A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	Joint (City of London and Amey) proposal regarding Business Continuity arrangements is in draft, expected to be signed-off in January.

Achievements

16. Since August 2014 the Cleansing Service have been working on two high profile public campaigns regarding smoking related litter and chewing gum. Both have seen a reduction in these types of litter being dropped on the City's streets.
17. In November the City was runner-up at the Chartered Institute of Waste Manager's prestigious Clean Britain Awards (medium population category) and presented with the Silver Award.

18. Five of our public conveniences achieved the gold standard at the 'Loo of the Year Awards', with the recently renovated toilets at Bank Station being recognised as platinum standard.

Appendices

- Appendix A – P2 KPI results
- Appendix B – Finance Report
- Appendix C – Business Risk

Background Papers:

DBE Business Plan 2014 - 2017

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Departmental Key Performance Indicators

		Target 14/15	P1 April – July 14/15	P2 Aug – Nov 14/15	
	Transportation & Public Realm				
NI 191	To reduce the residual annual household waste per household.	373.4kg	125.03kg	130.78Kg	☺
NI 192	Percentage of household waste recycled.	43%	37.31%	34.57%	☹
NI 195	Percentage of relevant land and highways from which unacceptable levels of litter, detritus, graffiti and fly-posting are visible.	2%	0.58%	1.29%	☺
TPR4	No more than 10 unresolved 'time banding' queries.	10	0	0	☺
DM7	To manage responses to requests under the Freedom of Information act within 20 working days. (Statutory target of 85%)	85%	99%	99%	☺
Comments	<p>NI192: Continues to be below target. A detailed report in relation to recycling levels will be reported to your next Committee.</p> <p>DM7: 19 FOI requests specific to the work of this Committee were received (27% of the departmental requests)</p>				

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Department of Built Environment Local Risk Revenue Budget - 1st April to 30th November 2014
(Income and favourable variances are shown in brackets)

Appendix B

	Latest Approved Budget 2014/15 £'000	Budget to Date (Apr-Nov)			Actual to Date (Apr-Nov)			Variance Apr-Nov £'000
		Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	Gross Expenditure £'000	Gross Income £'000	Net Expenditure £'000	
Port Health & Environmental Services (City Fund)								
Public Conveniences	940	913	(287)	626	911	(354)	557	(69)
Waste Collection	104	657	(588)	69	632	(588)	44	(25)
Street Cleansing	3,913	2,934	(325)	2,609	2,930	(344)	2,586	(23)
Waste Disposal	716	906	(429)	477	853	(437)	416	(61)
Transport Organisation	122	194	(113)	81	206	(114)	92	11
Cleansing Management	372	248	0	248	257	0	257	9
Built Environment Directorate	723	490	(8)	482	465	(8)	457	(25)
TOTAL PORT HEALTH & ENV SRV COMMITTEE	6,890	6,342	(1,750)	4,592	6,254	(1,845)	4,409	(183)

Forecast for the Year 2014/15			Notes
LAB £'000	Forecast Outturn £'000	Over / (Under) £'000	
940	888	(52)	1
104	135	31	
3,913	3,896	(17)	
716	676	(40)	2
122	129	7	
372	381	9	
723	679	(44)	3
6,890	6,784	(106)	

Notes:

- 1 Public Conveniences** - favourable variance is mainly due to salary savings as a result of the decision to end extended opening hours and additional barrier income generated from Tower, following the poppies art display.
- 2. Waste Disposal** - favourable variance is mainly due to savings from the co-mingled waste contract and expenditure savings on the Ideal Waste contract.
- 3. Built Environment Directorate** - favourable variance is due to savings for staff not in the pension fund and savings on the computer hardware purchases budget.

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Business Risk Management Update (November 2014)

- 1) All risks, relevant to this Committee, have been reviewed in accordance with corporate policy. A summary of all risks is at paragraph 6.
- 2) No new business risks have been identified.
- 3) There is no change to the mitigated or unmitigated impact or likelihood score of any risk.
- 4) The review of all existing risks identified 5 with changes. The following table gives a summary of the changes.

Risk Title	Change Summary
A fatal road accident to a member of staff etc.	Policy has been agreed by COG and HR are now leading on implementation.
A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	Joint (City of London and Amey) proposal regarding Business Continuity arrangements is in draft, expected to be signed-off at the Contract Board in January.

- 5) All risks have been reviewed for the effectiveness of the controls. There are no changes since the last report.

No risks are assessed as Red (*Existing controls are not satisfactory*) and all but one have been assessed as Green (*Robust mitigating controls are in place with positive assurance as to their effectiveness*).

The one risk that is assessed as Amber (*Existing controls require improvement or mitigating controls identified but not yet implemented fully*) is that "A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot". Work is in hand to continue the implementation of the controls.

- 6) The Summary of the Business Risks faced by the Department of the Built Environment, relevant to the work of this Committee (in decreasing order of mitigated risk) are:

Risk	Owner	Mitigated Impact	Mitigated Likelihood	Mitigated Risk	Effectiveness of controls
A fatal road accident to a member of staff etc.	Transportation & Public Realm / Cleansing	4	2	17	Green
Major contractor goes into liquidation before selling business as a going concern	Transportation & Public Realm / Cleansing	4	2	17	Green
Service failure by major contractor	Transportation & Public Realm / Cleansing	3	2	10	Green

Long term disruption to supplies of diesel fuel	Transportation & Public Realm / Cleansing	3	1	6	Green
Prohibition notice served on Cleansing fleet	Transportation & Public Realm / Cleansing	3	1	6	Green
A major incident, such as flooding or fire, makes Walbrook Wharf unusable as a depot	Transportation & Public Realm / Cleansing	2	2	5	Amber
City Streets/pavements not kept passable during times of snow	Transportation & Public Realm / Cleansing	2	1	3	Green

Committee(s):	Date(s):
Port Health and Environmental Services - For information	20 January 2015
Subject: Cleansing Service Campaigns Update	Public
Report of: Director of the Built Environment	For Information
Summary	
<p>This report updates the committee on the success of the two campaigns run by the Cleansing Service in partnership with Keep Britain Tidy in September and October.</p> <p>These campaigns focussed on smoking related litter and chewing gum litter, both of which have been highlighted in our Local Environmental Quality Survey as high priority problems within the City's street scene.</p> <p>The report also details the action the Cleansing Service will be taking to follow up on these campaigns to ensure the improvements in the City's street scene are maintained.</p>	
Recommendation(s)	
Members are asked to:	
<ul style="list-style-type: none"> • Note this report. 	

Main Report

Background

1. Smoking related litter is consistently identified as the main litter challenge that the City faces. In the City's 2013/14 Local Environmental Quality Survey it made up 90% of the incidents of litter found. The same survey found that chewing gum was also a major problem with staining found at 98% of the locations that were surveyed. Finding ways to reduce these types of littering before they reach the streets is important given the increasing pressure on service budgets.
2. In September 2014 the Cleansing Service relaunched the smoking related litter campaign, previously known as 'No ifs, no butts', as "No Small Problem". The refreshed campaign aimed to raise the profile of the extensive smoking related litter work the Cleansing Service carry out in terms of both cost and activity. It also aimed to reinforce the strong and simple message in people's minds that cigarette butts are litter (dropping of which has the possible consequence of an £80 Fixed Penalty Notice or a criminal conviction and fine of up to £2,500), and direct smokers towards City services where they can get help to quit. Achieving these aims should lead to a reduction in the amount of smoking related litter dropped in the City.

3. To help tackle chewing gum litter the City was the national launch partner for Defra's Chewing Gum Action Group Campaign during October. This is a national campaign organised by Defra and brings together representatives from the chewing gum industry, Keep Britain Tidy, Keep Wales Tidy, the Local Government Association (LGA), the Chartered Institution of Wastes Management, Keep Scotland Beautiful, Scottish Government, the Welsh Government and the Food and Drink Federation. Twelve Local Authorities and Business Improvement Districts participated this year with funding for a national advertising campaign being provided by companies from the chewing gum industry (Mondeléz International, Wrigley and Perfetti van Melle).

Current Position

Smoking Related Litter Campaign

4. The "No Small Problem" campaign had five main channels to promote the message to the public: printed media, online, traditional media, on street publicity events and Street Environment Officer engagement.
5. Three poster variants were designed with Keep Britain Tidy and in full consultation with the City's Public Relations Office, highlighting the size of the problem of cigarette litter in the City. These posters were displayed at multiple sites to maximise impact:
 - Over 400 A4 posters attached to the posts above butt bins in high footfall areas in throughout the City.
 - Approximately 100 A3 posters were displayed on planters, fences and bollards in high footfall areas throughout the City.
 - 50 full side posters were attached to our Big Belly Solar Compactor Bins.
 - Around 60 posters were displayed in various City offices and information areas.
 - 31 public houses (members of the Community Toilet Scheme) displayed posters and used over 1,000 beer mats.
 - 42 other City businesses displayed over 200 posters and 500 postcards throughout their buildings.
6. In engaging with businesses to ask them to support the campaign our Street Environment Team has signed up another 30 companies to our Business Environmental Charter. On top of this we worked with six different companies/ organisations and sold them with over 3,000 pocket ashtrays at cost price to issue to staff, arranged focussed enforcement work around their buildings and purchased and installed 12 additional street butt bins.
7. At the launch of the campaign we managed to achieve a high level of coverage on various types of social media. Thanks to a retweet by Kirstie Allsopp (an ambassador of KBT) our message reached over 600,000 people on twitter, leading to our video being viewed over 15,000 times on either the City or Keep Britain Tidy's YouTube channels. Our campaign was also mentioned on several Public Relations websites (such as Event Magazine and PR Examples) as an example of innovative marketing.
8. The campaign was featured on ITV London news and the Chairman of this committee was also filmed at the Bank Station publicity event for a documentary to be broadcast on the BBC. Whilst there was limited coverage in the traditional press, it was covered by City AM online.

9. The on street publicity events, held at Liverpool Street, Cannon Street, Fenchurch Street, St Pauls, Monument/London Bridge and Bank Station were amongst the most successful elements of the campaign. The public's response to our "littering" of 50 oversized cigarette butts at these high profile locations was excellent, with Officers receiving countless comments about how effective this was at raising awareness of the problem. Photos showing examples of these events can be seen in Appendix A.
10. At these publicity events our Street Enforcement Team were able to engage directly with the public and explain the message in person. They distributed 6,000 personal ashtrays to the public along with the same amount of leaflets reinforcing the campaign message, with advice on the reverse of on where to get help to quit. After the first two weeks of the campaign our Street Environment Team returned to the same areas to carry out enforcement activities, where possible supported by the City of London Police. On these occasions Officers issued another 100 Fixed Penalty Notices to people caught dropping cigarette litter on the street. This brings the total number of Fixed Penalty Notices issues since 2012 to over 950.

Location	Total
Cannon Street Station	23
St Pauls Station (incl. Panyer Alley/Newgate Street)	20
Fenchurch Street Station	26
Monument Station (incl. London Bridge/Fish Street Hill)	14
Liverpool Street Station	17

11. The independent surveying commissioned to gauge the effect that the campaign has had on the amount of cigarette litter dropped on the City's streets showed an overall reduction of 22%, with one area, Bank Station, showing an impressive 73% reduction. Whilst being very positive, this type of surveying can only show a moment in time, which was during a high profile campaign. Our regular monitoring since the campaign has finished indicates that the level of smoking related litter has returned to pre campaign levels.
12. The initial online surveying to gauge the amount of understanding people have of issues around cigarette litter has been conducted with over 300 responses received. The follow up survey had fewer responses (80 in total) but showed an encouraging 15% rise in awareness of the campaign and of the assistance the City can provide to help quit smoking.
13. To replicate and maintain the success of this campaign the Street Environment Team are planning to hold week long publicity, education and enforcement events at the highest profile commuter sites in the City on a quarterly basis to ensure the message remains in the public's mind. This will be in addition to the year round programme of regular smoking related litter enforcement that the Street Environment Team undertakes, which focuses on identified littering hotspots. Additionally, following a presentation on the campaign by Officers at a Keep Britain Tidy event, the City has been approached by four other local authorities (Daventry DC, London Boroughs of Hackney and Wandsworth and Chelmsford City Council) with requests to borrow the 50 oversized cigarette butts, with a view to recreating similar

publicity events in their areas. We will look to continue providing this assistance for as long as the cigarette butts remain usable.

14. A case study of the campaign is being prepared and will be used to enter appropriate award schemes where possible to gain recognition for the City's efforts in tackling smoking related litter and provide inspiration for other authorities.

Chewing Gum Action Group

15. The "Bin It Your Way" campaign has been running throughout October. In spite of the limited amount commercial advertising opportunities across the City we were able to secure high profile sites such the large Transvision screens at Liverpool Street station, phone boxes and eight bus sides on routes that pass through the City. This was supported by the distribution of "gum wrappers" (packets of paper for gum chewers to use to dispose of gum, designed with the campaign's imagery on the packet and also carrying the warning of the possible penalties for littering).
16. The Chairman of this committee was photographed for the campaign's press release using the Ecogum removal equipment that the Cleansing Service uses to remove chewing gum from the City's pavements. This press release gained good coverage including internationally in publications such as Resource, Shanghai Daily, China.org, Global Post, Malaysian Digest and Bernama and examples of this can be seen in Appendix B.
17. The final survey results show an average 31.6% reduction in the amount of chewing gum dropped at the nine survey sites during the campaign. Due to the surreptitious nature of chewing gum littering the Street Environment Team have been unable observe anyone dropping this kind of litter and therefore have not issued any Fixed Penalty Notices for this offence. Officers will continue to attend the regular meetings of the Chewing Gum Action Group to contribute our experience of the campaign and share or receive best practice and ideas on how to tackle chewing gum littering. Officers will also continue to distribute the "gum wrappers" where possible, and liaise with shops that sell chewing gum to provide them at the point of sale.

	1st Inspection	2nd Inspection	Percentage
St Paul's Station	13	10	-23.1%
Old Change Court	28	15	-46.4%
Barbican Station	23	13	-43.5%
Watling St - South	6	2	-66.6%
Watling St - North	3	2	-33.3%
Liverpool Street	9	6	-33.3%
Fenchurch Street Station	7	4	-42.9%
Queen Victoria Street	12	7	-41.6%
Royal Exchange	6	6	0.0%

Corporate & Strategic Implications

18. Both these campaigns supported the City's aim in the Corporate Plan to provide modern, efficient and high quality local services and policing within the Square Mile for workers, residents and visitors with a view to delivering sustainable outcomes. They also supported the key policy priority of maintaining the quality of our public services whilst reducing our expenditure and improving our efficiency.
19. The plans to lend the oversized cigarette butts to other local authorities, enabling them to replicate our campaign, supports the City's aim to assist other local authorities.

Implications

20. The costs of both campaigns were kept as low as possible and within budget. There are no ongoing financial implications for the planned monthly smoking related litter focussed enforcement activities as these will be carried out within existing resources. The "gum wrappers" have been provided by the Chewing Gum Action Group and therefor also have no financial implications.

Conclusion

21. Both the smoking related litter and chewing gum campaigns have been a success. However, as the improvements seen were short term Officers will continue to raise the public awareness of the problems caused in the City by smoking related litter and chewing gum by conducting more frequent high profile campaigns.
22. Reductions in both types of litter are essential if we are to maintain cleanliness standards within current budgets given the considerable extra daytime population expected via Crossrail etc.

Appendices

- Appendix A – On street publicity events.
- Appendix B – Chewing Gum Action Group coverage.

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Appendix A – On street publicity events.



Appendix A – On street publicity events.



Appendix B – Chewing Gum Action Group coverage.

resource

Daily news and features for the waste to resources industry

Fri 24 Oct 2014 About us - Login/Register

SEARCH

COMPANY NEWS: Nuclear waste consultancy Stuvia is developing a redundancy programme for its Waste Treatment operation.

NEWS MATERIALS BUSINESS GOVERNMENT RESOURCE USE SUSTAINABILITY MAGAZINE

RESOURCE USE EDUCATION

CITY OF LONDON CLAMPS DOWN ON CHEWING GUM LITTER

By Anthony Halliwell | 23 September 2014 | [Add a Comment](#)

PRINT E-MAIL SHARE

The City of London Corporation (CLC), responsible for oversight of London's financial centre, is today (23 September) launching its annual campaign to reduce chewing gum litter within the area (commonly referred to as the Square Mile).

The CLC has once again partnered with the Chewing Gum Action Group (CGAG) to encourage its 400,000 commuters and 9,000 residents to dispose of chewing gum in waste bins, under the slogan 'Bin it your way'.

This year's campaign will include 'professionally choreographed' street dance moves and a range of 'dynamic, brightly coloured adverts', which will appear across the local area to encourage gum chewers to responsibly dispose of gum litter. Alongside this, the CLC is warning that those found littering could face an on-the-spot fine of up to £80.

Raising awareness of the 'sticky situation'

Wendy Mead, Chairman of the CLC's Environment Committee (pictured, right), said: "We want to keep the world's leading international financial centre looking as attractive as possible because a first class city needs first class streets.

"Chewing gum litter is a real nuisance that is costly and difficult to remove. We want our residents and workers to be proud of their environment which is why we've partnered with the Chewing Gum Action Group to raise awareness of this rather sticky situation."

CGAC Campaign Co-ordinator Kristan Bentham, added: "Year on year we have seen the chewing gum action campaign deliver some great results. We are delighted to be working with the City Corporation this year to help them create cleaner, more attractive place to live and work."



ALSO SEE

Campaign launched to reduce chewing gum litter
The Chewing Gum Action Group (CGAG) launches 'Bin it your way' advertising campaign to reduce littered gum in the UK.

RECENT NEWS

Torfaen rejects monthly waste collection proposals
Torfaen County Borough Council has rejected proposals to move to monthly waste collections, instead opting for smaller waste bins.

John Griffiths AM opens Wastesavers Reuse Centre
Assembly Member for Newport East, John Griffiths AM, has opened Wastesavers' new Reuse Centre in Newport.

Recycled aluminium used in 'most efficient jaguar ever'
Three-quarters of the body of the new Jaguar XE is made from recycled aluminium, making it 'the most efficient Jaguar ever'.

Northern Ireland recycles and composts more than it landfills
New figures show that Northern Ireland has sent more waste for recycling and composting than to landfill for the first time.

Second round of WRAP's waste prevention fund to open in November
The second application round for grants from WRAP's Innovation in Waste Prevention Fund will open next month.

China's first dedicated aluminium automotive sheet facility opens
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London launches new campaign to reduce chewing gum litter

Sep 22, 2014

LONDON, Sept. 22 (Xinhua) -- The legendary Dick Whittington headed to London after being told its streets were paved with gold.

If he was to make the same journey today, many centuries later, he'd find the streets paved with chewing gum.

The famous City of London on Monday became one of the towns and cities in England to jointly launch an official campaign to reduce the amount of chewing gum littering the pavements.

Encouraging visitors and workers to discard of chewing gum responsibly, the 12 locations have joined forces with the Chewing Gum Action Group (CGAG) to tackle the problem.

CGAF is tasked with tackling gum litter in Britain, with funding coming from the chewing gum industry.

The campaign will see the chewing gum industry working with town and city councils to develop local initiatives to reduce chewing gum litter.

Results from previous work demonstrate the significant impact of the campaign on gum litter levels, reducing gum litter by half, and even higher in some cases.

In Wimbledon, the world famous home of lawn tennis, an earlier campaign saw a 67 percent decrease in gum litter.

Commenting on the launch of the campaign today the UK Government's Environment Minister Dan Rogerson said: "Discarded chewing gum is a blight on our streets and can cost individual local authorities as much as 200,000 pounds a year to clean up. Previous CGAG campaigns have been successful, so I look forward to seeing the results of this year's efforts."

Phil Barton, Chief Executive at Keep Britain Tidy which is a partner in CGAG, said: "As a group we are committed to tackling the issue of gum litter to help create cleaner, more attractive places to live and work."

The litter drive being launched today will see an advertising campaign featuring professionally choreographed and highly innovative dance moves. The aim will be to encourage gum chewers to dispose responsibly of gum litter in a fun and engaging way or face a fine of up to 80 pounds (131 U.S. dollars). Dynamic, brightly colored adverts will appear in a range of locations, including roadside banners, bus stops, lamp-posts and telephone kiosks.

Joining the City of London in today's campaign are areas in England, Wales and Scotland, including for the first time a university campus in Coventry.



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Committee(s):	Date(s):
Port Health and Environmental Services	20 January 2015
Subject: Household recycling services and the requirements of the Waste Regulations 2011 (amended 2012) “TEEP”	Public
Report of: Director of the Built Environment	For decision
Summary	
<p>Your Committee received a report from the Director of the Built Environment on 18 November 2014 providing information regarding the Waste (England and Wales) Regulations 2011, which transpose the revised Waste Framework Directive 2008/98/EC2 (rWFD) into English legislation. The legislation brought in to law the “waste hierarchy” and a requirement to separately collect four types of recyclate unless it can be shown that this would not be Technically, Environmentally or Economically Practicable (TEEP).</p> <p>City Officers subsequently commissioned the specialist waste industry consultancy Eunomia Research & Consulting to complete an independent assessment of our recycling collection methods and advise in relation to compliance with the TEEP regulations. Eunomia’s report has now been received and advises that:</p> <ul style="list-style-type: none"> • The Corporation’s efforts to encourage waste prevention, reuse and recycling mean that it is compliant with its waste hierarchy obligations, although some administrative actions are recommended. • Separate collection is required only if, in terms of the law, it is both “necessary” and “technically, economically and environmentally practicable”. • The advice received is that separate collection is: <ul style="list-style-type: none"> ▪ Necessary, because it would improve the quality of recycling; ▪ Technically practicable, although it presents significant difficulties; and ▪ Environmentally practicable, because separate collection would yield greater carbon dioxide savings than co-mingled collections. • However, separate collection would be approximately £440K (72%) more expensive than the current collection system. A system in which paper and card are collected separately from other materials would be £130K (21%) more expensive than the current system. These additional costs would be attributed to increased staff, vehicles, depot, treatment and processing costs. This represents an excessive cost for the Corporation, and means that separate collections are not economically practicable. <p>There would also be substantial transitional costs (recruiting staff, setting up new materials contracts and legal and compensation costs associated with halting or amending the current contract with Amey) for the Corporation to bear due to the need to amend its collection contract with Amey, which is due to continue until 2019.</p> <p>Recommendation(s)</p> <p>Members are asked to:</p> <ul style="list-style-type: none"> • Note the report; and 	

- Approve the recommendation that any separate collection for paper, plastic, metals and glass is currently not economically practicable.

Main Report

Background

1. The City currently collects Dry Mixed Recycling (DMR), comprising of paper, plastic, metal and glass, using a comingled process. The DMR is then transported to an external Materials Reprocessing Facility (MRF) to be separated into individual recyclable material streams.
2. On 1 October 2012, amendments to the 2011 Waste (England and Wales) Regulations came into force through the Waste (England and Wales) (Amendment) Regulations 2012 which transpose the revised Waste Framework Directive 2008/98/EC2 (rWFD) into English legislation.
3. Regulation 12, which came into force in 2011, places an ongoing requirement on all waste collection authorities to apply the waste hierarchy to all materials collected.
4. Regulation 13 requires that from 01 January 2015 every collector of waste (including the City of London) must collect paper, plastic, metal and glass (the four materials) for recycling. It further requires that this should be by way of separate collection where it is:
 - necessary to facilitate or improve recovery (in effect, to provide high quality recyclates), and
 - technically, environmentally and economically practicable (TEEP) to do so.
5. Interpretation of the Regulations is not straightforward and the way that the rWFD is transposed in the Regulations has been the subject of judicial review. The original wording of Regulation 13 was amended by the Department for Environment, Food and Rural Affairs (DEFRA) and Welsh Ministers in 2012, clarifying that co-mingled Dry Mixed Recycling (DMR) is not a form of separate collection.
6. In the absence of guidance from DEFRA on how to interpret the law, a “Route Map” has been created by a variety of bodies, including Waste & Resources Action Programme (WRAP) and the London Waste and Recycling Board (LWARB) to provide some guidance and interpretations of the likely practical meaning of the law.
7. Your Committee agreed that, in view of the complexity of the law and the uncertainty of its interpretation, it was appropriate to seek external advice. This has now been received from Eunomia. Copies of this full report are available on request.

Findings

8. The review indicates that the waste hierarchy has been given due consideration in the design of the City of London’s service, and that our current system of collections, support for reuse projects and waste prevention campaigns mean that the City of London would be in a good position to respond effectively to any hierarchy-based legal challenges that can reasonably be envisaged.

9. A number of recommendations are made for administrative actions to summarise, plan and monitor future work relevant to our waste hierarchy compliance to ensure that this high level of compliance is maintained. These are detailed in Appendix A and will be included in the City’s Recycling Action Plan which is currently being reviewed.
10. With regard to the legal requirement to separately collect materials, the report examines two options that, while posing logistical challenges, might be feasible to implement – separate collection of three-streams of recycling (paper/card, glass, plastic/metals), and separate collection of two-streams (paper/card and other materials). These options are proposed as those most likely to deliver the necessary level of separate collection to provide the required high quality recycling while overcoming the specific challenges of limited storage space that the City’s housing stock presents for waste collection. Nevertheless, there are concerns as to whether any increase in separation of materials at the point of collection is practicable in the City.
11. Although it would not increase the quantity of recycling, increased separation of recyclables is deemed likely to improve the quality of the materials collected. As a result, separate collection is considered “necessary” within the meaning of the law. However, this position may change if the City is able to establish that the quality of the material produced under its new MRF contract is sufficiently high to meet the quality benchmarks explained in the report.
12. Both the two-stream and the three-stream systems mentioned in paragraph ten appear to be environmentally practicable. However, they would result in an increase in costs of 72% and 21% respectively as detailed in the table below. These costs are considered excessive given the City’s financial constraints and the level of the environmental benefits that could be achieved. Neither system would therefore be economically practicable.

	Current Co-mingled collection	Option 1: Separate 4 stream collection	Option 2: Separate 2 stream (paper) collection
Cost	£611,959	£1,051,528	£742,453

13. The overall finding is therefore that, whilst “necessary”, increased separation of materials would not be practicable for economic reasons.

Next steps

14. The TEEP test will need to be reviewed on an ongoing basis. Contracts, material prices or technology may change, removing or introducing barriers to compliance which could change the outcome of the test, and thus the decision reached in the consultants’ report may not hold if there are significant changes in the future.
15. The City will also need to consider the application of the Waste Regulations when future changes to the service are being planned, for example when extending or retendering the waste contract, changing MRF or when material costs significantly change.

Financial Implications

16. Should the committee choose not to confirm the recommendations and opt instead for separate collections detailed, there would be a significant increase in the cost of waste collections ranging from approximately £130,000 to £440,000.

Legal Implications

17. The City should keep and be able to provide for inspection, this report and the modelling work supplied by the Eunomia. This will help the Environment Agency (EA) to understand the basis of the decision-making process that justifies retention of the fully comingled dry mixed recycling service. These records would also be the basis of the City's argument if it was required to demonstrate compliance with the regulations in a court of law.

18. Whilst the EA has finalised and released the regulatory regime they will adopt from January 2015, the legislation will remain open to interpretation until tested and very little statutory guidance from the EA is currently available (despite Regulation 15 making provision for such guidance). Officers will review the City's position as soon as any statutory guidance becomes available.

Conclusion

19. The assessment of the City's waste services with regard to the application of the waste hierarchy indicates that measures have been taken to seek to reduce and reuse a wide range of materials. Residents are able to recycle all commonly recycled materials. While the Corporation will need to continue to undertake action to encourage waste prevention and reuse, the Eunomia report does not identify any additional material collection services that would (in the terms set out in Regulation 12) be "reasonable in the circumstances".

20. City of London Officers agree that, based on the options appraisal undertaken by the consultants, the additional costs of separate collection would be excessive, and that separate collection is therefore not "economically practicable" (in the terms set out in Regulation 13) this justifies making no change to the current waste / recycling collection system.

21. It is proposed this report and the findings of Eunomia's detailed report will form the basis of the Corporation's response to the expected EA request for all Local Authorities (including the City) assessments of their compliance position with respect to the Waste Regulations. Copies of the Eunomia's full detailed report are available in the Member's reading room or upon request.

Appendices

- Appendix A – Eunomia's Report: Waste Hierarchy Recommendations.
- Appendix B – Waste Regulations Compliance Review.

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Appendix A - Eunomia's Report: Waste Hierarchy Recommendations

Recommendation 1:

The Corporation may wish to produce and maintain an overview, based on Table 3-1, to evidence the actions carried out to implement the waste hierarchy and the rationale for their selection.

Recommendation 2:

The Corporation may wish to ensure that it has a clear timetable in place showing planned actions relevant to the waste hierarchy.

Recommendation 3:

The Corporation may wish to put in place documents that explain its rationale for incineration of certain material streams or state why it is not reasonable to take action to move these materials further up the waste hierarchy.

Recommendation 4:

An analysis of the impact of waste prevention and reuse measures would provide the Corporation with further evidence of the effectiveness of the actions they have taken to apply the waste hierarchy; if this is not deemed feasible, the Corporation should record the reasons why.

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Waste Regulations Compliance Review

1.0 Introduction

Eunomia Research & Consulting (Eunomia) has prepared this report for City of London Corporation ('the Corporation') to provide a review of the Corporation's preparedness to demonstrate compliance with the Waste England and Wales Regulations 2011 (as amended) ('the Regulations').^{1 2}

Under the Regulations:

- Regulation 12, which came into force in 2011, places an ongoing requirement on authorities to apply the waste hierarchy.
- Regulation 13 states that from 1st January 2015, all waste collectors in England and Wales will be required to collect glass, metal, paper, and plastic ('the four materials') in separate streams where doing so is both necessary and technically, economically and environmentally practicable (TEEP).

Effectively, "necessity" and "practicability" are two tests that, if met, mean that separate collection is required. There is no statutory guidance on how to determine whether separate collection is "necessary" or "practicable". However, WRAP, the London Waste and Recycling Board, and Waste Network Chairs commissioned Eunomia to prepare a "Route-map" to assist authorities in interpreting the law.³ The Environment Agency (EA) has signalled that it will take account of the Route-map as part of its regulatory approach.⁴ The advice in this report is therefore closely based on the approach set out in the Route-map.

1.1 Waste Collections in City of London

Waste collection in the City of London differs greatly from other waste collection authorities. The 6,500 households within the City are located almost entirely in low-rise and high-rise blocks that have very limited storage space for waste containers and utilise communal bins. To overcome these challenges the Corporation's current collection system combines several different collection methods and frequencies:

- Residual:
 - Barbican: daily doorstep collections Monday-Friday using bags and access to communal bins
 - Golden Lane, Mansell Street and Middlesex Street Estates: households receive doorstep collections and have waste chutes to communal bins

¹ UK Government (2011) The Waste (England and Wales) Regulations 2011, 28th March 2011

² UK Government (2014) The Waste (England and Wales) (Amendment) Regulations 2012, 1st October 2012

³ WRAP, and LWARB (2014) *Waste Regulations Route-map*, April 2014

⁴ Environment Agency (2014) *Separate Collection of Recyclables: Briefing Note*, June 2014

- Private blocks with bin store: collections 1-5 times per week from communal bins
- Private blocks without bin store: daily time-banded doorstep collection of sacks (sacks must be set out between 6.30pm and 7.30pm)
- Dry Recycling (accepting paper, card, glass, tetra paks, foil, cans, mixed plastic and plastic bags):
 - Barbican: daily doorstep collection of co-mingled recycling collected Monday-Friday using clear sacks and access to communal bins
 - Golden Lane, Mansell Street and Middlesex Estates: doorstep collections of comingled recycling twice weekly using clear sacks
 - Private blocks with bin store: collections 1-5 times per week from communal bins
 - Private blocks without bin store: Daily time-banded doorstep collection of sacks (sacks must be set out between 6.30pm and 7.30pm)
- Collections of food waste (presented in caddies) are available at all four city estates, at the same time as comingled recycling is collected. Certain private blocks with bin stores have separate weekly food waste collections from communal bins

The Corporation also provides the following waste services:

- household bulky waste and bulky reuse collections;
- bring or communal bin sites, often including facilities for materials such as textiles (Salvation Army charity bins), batteries, light bulbs and small WEEE;
- hazardous waste collections, where requested by residents;
- clinical waste collections, where requested by residents;
- a seasonal Christmas Tree collection service from designated collection points; and
- on street litter and recycling collection as well as street cleansing services, which includes the separation of waste and recycling from street sweeper barrows.

1.2 About This Report

Eunomia has undertaken a detailed review of documents and data provided by the Corporation to assess whether:

- the policies and practices of the Corporation allow it to demonstrate that it has, as required by Regulation 12, taken “all such measures available to it as are reasonable in the circumstances” to apply the waste hierarchy; and
- the Corporation has the information in place to enable it to demonstrate if separate collection of one or more of the four recyclable materials specified in the law (glass, metal, paper, plastics) is necessary (to facilitate or improve recovery) and practicable.

The report identifies any gaps in the Corporation's current evidence base, and the opportunities for the Corporation to take action to demonstrate compliance. It provides the Corporation with:

- a list of the data and written evidence of policies and decisions that would be required to demonstrate compliance; and a 'gap-analysis', detailing exactly what information is already held by the Corporation, whether the evidence is likely to meet the standards required, and where data-gaps are evident or additional work may be required to build the evidence base (Section 3.0 and Section 4.0);
- an explanation of the modelling methodology used in this report (Section 5.0 **Error! Reference source not found.**);
- an examination of whether separate collection of the four recyclable materials specified in the law (glass, metal, paper, plastics) is necessary in the City of London (Section 6.0);
- an examination of whether separate collection of the four recyclable materials specified in the law (glass, metal, paper, plastics) is practicable in the City of London (Section 7.0); and
- a summary of the Corporation's likely position with respect to the Regulations, where opportunities exist to demonstrate compliance within the current collection model and an overview of next steps in order to secure the Corporation's position (Section 8.0).

2.0 Regulatory Background

The following sections provide further detail on each of the key regulations.

2.1 Regulation 12: Waste Hierarchy

Regulation 12 places no restriction on the types of waste to which the hierarchy should be applied.⁵ Under the Regulations, the waste hierarchy must therefore be applied to each type of material collected, whether it is currently separated for recycling, or collected as part of the residual waste stream. The Department for Environment, Food and Rural Affairs (DEFRA) has produced detailed guidance on how to apply the waste hierarchy, which may be a helpful addition to this summary.⁶

It is important to consider first the steps that could be taken to achieve the highest levels of the hierarchy, before considering whether it would be "reasonable in the circumstances" to manage waste at that level. Although compliance with the hierarchy is not optional, Regulation 12 states that departure from it is allowed when the measures that would be required would not be "reasonable in the circumstances", or where departure will "achieve the best overall environmental

⁵ Waste (England and Wales) Regulations (as amended), Regulation 12(1).

⁶ DEFRA (2011) *Guidance on Applying the Waste Hierarchy*, June 2011, <http://www.defra.gov.uk/publications/files/pb13530-waste-hierarchy-guidance.pdf>

outcome where this is justified by life-cycle thinking on the overall impacts of the generation and management of the waste”.

When considering the ‘overall impacts’ the following must be taken into account:

- the general environmental protection principles of precaution and sustainability;
- technical feasibility and economic viability protection of resources; and
- the overall environmental, human health, economic and social impacts.⁷

In practice, moving less widely recycled materials (those other than glass, metal, paper, plastic and perhaps food) up the hierarchy may in many cases necessitate collecting it separately from residual waste – and often from all other materials.

The wording of Article 4 of the WFD is also relevant to the interpretation of the waste hierarchy. As well as considering what may justify departure from the waste hierarchy, Article 4(2) explains that when applying the waste hierarchy you should “take measures to encourage the options that deliver the best overall environmental outcome.” The best environmental outcome, perhaps identified through lifecycle thinking, may therefore be a relevant consideration in deciding what approach to recycling should be adopted – not just in deciding whether downward departure from the hierarchy is allowable.

2.2 Regulation 13: Separate Collection

The “necessity” and “practicability” tests are two tests that, if met in respect of any of the four materials (glass, metal, paper/card, plastic), mean that separate collection of that material is required.

There is no statutory guidance on how to determine whether separate collection is “necessary” or “practicable”. However, WRAP, the London Waste and Recycling Board, and Waste Network Chairs commissioned Eunomia to prepare a “Route Map” to assist authorities in interpreting the law.⁸ The Environment Agency has signalled that it will take account of the Route Map as part of its regulatory approach.⁹ The advice in this report is therefore closely based on the approach set out in the Route Map.

Applying the tests will require authorities to gather and assess a good deal of information to demonstrate the reasoning supporting the decisions they have made, or to undertake new work to determine if changes to their collection system are required by law.

Further detail on the key terms used are outlined in the sections below.

⁷ Waste (England and Wales) Regulations (as amended), Regulation 12(3)

⁸ WRAP, and LWARB (2014) *Waste Regulations Route-map*, April 2014

⁹ Environment Agency (2014) *Separate Collection of Recyclables: Briefing Note*, June 2014

2.2.1 *Technically Practicable*

The European Commission guidance on the WFD says that “‘Technically practicable’ means that the separate collection may be implemented through a system which has been technically developed and proven to function in practice.” In order to establish whether separate collection is likely to be technically practicable for an area, it should be established whether separate collection systems have previously been developed and proven to function in practice in an authority with similar relevant characteristics; or whether there are specific local issues that make separate collection inordinately difficult.

The material collected through separate collection would also have to be technically capable of being recycled. The range of materials that can be recycled is growing, and some investigation of recycling options would be needed to support a conclusion that, for example, due to a lack of available processing capacity it is only technically practicable to collect plastic bottles, not other plastics. If processing capacity is available, but not cost effective, this would be an issue of economic practicability.

2.2.2 *Environmentally Practicable*

The European Commission guidance on the WFD says that “‘Environmentally practicable’ should be understood such that the added value of ecological benefits justifies possible negative environmental effects of the separate collection (e.g. additional emissions from transport).” A system will therefore be environmentally practicable if the benefits from increased or improved recycling outweigh any negative impacts.

However, it is reasonable to expect the environmental benefits of any normal form of collection of the four materials to outweigh the environmental costs. The Route Map therefore suggests that it may be reasonable to look at the relative costs and benefits of different collection systems.

Whilst the default option is separate collection, if co-mingled collection seems to lead to substantially better environmental performance over all, this may be evidence that it is permissible.

2.2.3 *Economically Practicable*

The European Commission guidance on the WFD says that “‘Economically practicable’ refers to a separate collection which does not cause excessive costs in comparison with the treatment [including recycling] of a non-separated [co-mingled or residual] waste stream, considering the added value of recovery and recycling and the principle of proportionality.”

‘Economically practicable’ does not mean ‘the cheapest option’. Separate collection will be economically practicable so long as the cost is not excessive, or disproportionate to the benefits. Except where any extra costs of separate collection are very small or very large, assessing ‘proportionality’ is not straightforward. It may not be sufficient to show, for example, that the extra costs would marginally exceed the current waste budget.

Authorities that have entered into long-term waste collection or disposal contracts that make it difficult for them to implement separate collections, especially if they have done so since the Regulations were implemented in their current form in 2012, will need to consider carefully how to take account of any constraints or termination costs associated with the contract. Termination or variation costs might be looked at separately from the basic economic case for the choice between separate and co-mingled collections.

2.2.4 *High Quality Recycling*

Whilst “high quality recycling” is not mentioned in Regulations 12 and 13, Defra’s Waste Management Plan for England, to which local authorities should have regard, states that “in effect” the Regulations “require the separate collection of waste paper, metal, plastic and glass from 2015 onwards wherever separate collection is necessary to get high quality recycling, and practicable.” The plan, which is itself a requirement of Regulation 7, is the principal way in which Article 10 of the WFD has been transposed into the law of England.

There is no simple definition of “high quality” recycling, and a number of competing definitions emerge from the legislation and associated documents. These are explored in more detail in Section 0.

3.0 Analysis of Information Provided by the Corporation

This section summarises the information supplied by the Corporation as evidence relevant to the demonstrating compliance with the Regulations.

3.1 Regulations 12: Waste Hierarchy

The information provided by the Corporation regarding its application of the waste hierarchy is set out in Appendix **Error! Reference source not found.** The information supplied has been sufficient to allow a detailed analysis to be carried out.

Actions taken by the Corporation to apply the waste hierarchy are summarised in Table 3-1 for all major material streams. Numbers in square brackets after each action refer to the document in which evidence for the action has been found. A full list of the documents referenced can be found in Appendix 0.

Table 3-1: Summary of Actions Taken to Apply the Waste Hierarchy

Material	Actions Taken		
	Prevention/Reduction	Reuse	Recycling
Dry recycling	<p>Mail Preference Service/No Junk Mail campaign [1]</p> <p>Smarter Shopping (although this campaign was last run more than 2 years ago) [1]</p>		Co-mingled collections of paper, cardboard, glass, mixed plastic, tetra paks, foil, plastic bags, cans and aerosols [1, website]
Food	<p>Love Food Hate Waste Campaign [1, web]</p> <p>WRAP funding received to deliver workshops, cookery demonstrations and distribute information to businesses and residents [1, 12]</p>		Food waste collections available at all 4 estates as well as some of the private blocks [1, website]
Bulky		<p>Partnership with London Re-Use Network who collect reusable bulky items for resale [1,4]</p> <p>Recycling Team currently assessing whether material can be pulled out of bulky collection points on estates to be sent for reuse or recycling [13]</p> <p>Give and Take Days [1, 7]</p>	<p>Recycling Roadshow [1]</p> <p>Push bike recycling</p>
WEEE	Restart pop-up events [10a,b,c]	Give and Take Days [7]	Collected in bring banks on the 4 estates [1]
Batteries			Collected in bring banks on the 4 estates and in battery bins located in public buildings e.g. libraries [1]
Low Energy Light Bulbs			Collected in bring banks on the 4 estates [1] and

Material	Actions Taken		
	Prevention/Reduction	Reuse	Recycling
			battery bins located in public buildings e.g. libraries
Textiles		Give and Take Days [7]	Collected in bring banks on the 4 estates [1]
Nappies	Real Nappies Campaign [1]		
Clinical	Free collections service where required – but evidence not provided regarding how it is treated [1]		
Streets/Litter			Street sweepings are manually sorted using split compartment sweeper barrows (comingled dry recycling and residual) [11]

3.2 Regulation 13: Separate Waste Collection

This section summarises the Corporation’s current collection system as set out in the proforma returned by the Corporation. The proforma relating to separate collections can be found in Appendix **Error! Reference source not found.** The Corporation has been able to supply the majority of information that would be needed to fully apply the necessity and practicability tests.

4.0 Waste Hierarchy Analysis

This section summarises the findings of a gap analysis relating to the Corporation’s evidence in regard to its application of the waste hierarchy.

4.1.1 *Waste Hierarchy Evidence of Policies and Decisions*

The documents provided by the Corporation demonstrate a clear understanding of the waste hierarchy legislation, which has been incorporated into its policies and is evidenced through action.

The Corporation provided evidence of policies, and actions, which addresses the requirement to apply the waste hierarchy for most materials. The Corporation can identify specific practical measures (see Table 3-1) carried out to implement the hierarchy that would provide a clear basis for the justification of its approach in respect of the key materials and waste streams, and many of the more minor ones, were it to be challenged.

All domestic residual waste is sent to energy recovery, with none going direct to landfill, ensuring that as little waste as possible is managed at the very bottom of the hierarchy.

It collects a wide range of materials from residential properties (including less commonly collected materials such as plastic pots, tubs and trays and tetrapaks), offers a food waste service to many of its residents and has a good network of bring sites that enable other materials, such as textiles and WEEE, to be collected on the City's four estates. Some material is also separated for recycling from the street litter that is collected by the Corporation, which is something that relatively few councils can boast.

The Corporation has been active in seeking to implement schemes to encourage residents to reuse items such as WEEE, clothes and bulky goods. It has entered into an arrangement with London Re-Use Network to try to further promote the reuse of furniture, and is examining the case for further action to identify potentially reusable bulky items collected from the bulky collection points on the estates.

The Corporation can also evidence steps that it has taken to promote waste prevention. Examples include its adoption of the Love Food, Hate Waste (LFHW) campaign and its efforts to encourage parents to try reusable nappies for their children are particular examples.

We were unable to establish with certainty how the clinical waste is managed, but our understanding is that this material is incinerated. There is unlikely to be any reasonable way of moving this material further up the waste hierarchy due to health and safety risks. The Corporation is clearly aware that the full potential for reuse and recycling of bulky waste is not yet being exploited, and is considering further steps to promote this.

Nevertheless, the Corporation could improve its ongoing readiness to respond to an enquiry regarding its waste hierarchy compliance by maintaining a document that tracks work done in this area.

Recommendation 1: The Corporation may wish to produce and maintain an overview, based on

Table 3-1, to evidence the actions carried out to implement the waste hierarchy and the rationale for their selection.

Compliance with the waste hierarchy is an ongoing requirement, and the Corporation may wish to ensure it maintains a forward plan of work in this area, which might be incorporated into the Recycling Action Plan.

Recommendation 2: The Corporation may wish to ensure that it has a clear timetable in place showing planned actions relevant to the waste hierarchy.

The Corporation is already considering whether there are additional measures which could cost-effectively help to divert additional bulky waste to higher levels of the hierarchy, not least through encouraging reuse. Whilst efforts are clearly made to divert material from the residual stream, and no material is sent directly to landfill, the Corporation may wish to set out its rationale for continuing to send recyclable and reusable material to incineration (e.g. that it has put in place all cost-effective measures, including awareness raising work, to encourage residents to move waste up the hierarchy).

Recommendation 3: The Corporation may wish to include in its Recycling Action Plan a rationale for incineration of certain material streams and state why it is not reasonable to take action to move these materials further up the waste hierarchy.

4.1.2 Data

The Corporation has been able to supply much of the data that we would expect it might need to rely on if challenged regarding its compliance with the hierarchy. However, a few areas where further work may be worthwhile have been identified.

In common with many other authorities, the Corporation cannot at present clearly evidence the effectiveness of the measures it has taken to prevent waste and encourage reuse and recycling, although it has taken sensible steps to try to monitor this where possible. This has revealed, for example, that the arrangement with London Re-Use Network has not yet delivered the level of diversion that was hoped for, and given the Corporation the opportunity to consider whether other measures might be employed to boost reuse.

The Corporation has not yet quantified the impact on waste arisings of its efforts to encourage waste prevention and preparation for reuse for other household waste arisings. Whilst waste prevention in particular is not entirely straightforward to evaluate, there are approaches that can be used to provide credible estimates. Noting the inherent difficulties in quantifying these impacts, the Corporation should record any decision made regarding whether such an assessment is feasible.

Recommendation 4: An analysis of the impact of waste prevention and reuse measures would provide the Corporation with further evidence of the effectiveness of the actions they have taken to apply the waste hierarchy; if this is not deemed feasible, the Corporation should record the reasons why.

5.0 Options Appraisal Methodology

The Waste Regulations Route Map indicates that in order to carry out the necessity and practicability tests, an options appraisal may be required in order to determine the likely costs and outputs of a separate collection system. Eunomia has followed this suggested approach in order to examine the implications of the tests.

5.1 Our Approach to Collection Options Appraisal

Eunomia's 'Practicability and Necessity' model (PAN) has been used to calculate the performance and costs associated with different doorstep waste collection scheme configurations for the Corporation. This model has been developed specifically to cost-effectively compare collection systems in relation to the requirements of the Regulations. Whilst it is a relatively simple model, it relies heavily on assumptions and an approach that are common to other such options appraisal tools.

In the model, a 'baseline' was created to represent the Corporation's current service. The aim of the baseline is to reflect the resources and logistics of the expected model as accurately as possible, so that it serves as a reliable foundation for testing various alternative collection options. Authority-specific inputs to the baseline include information regarding the Corporation's number and type of households, current services and service performance, resources, and waste composition. Known inputs (from the perspective of the model these include tonnages of each material type collected, numbers and types of households offered the service, tipping locations as per the current collection system, including the new MRF location) are calibrated to known outputs (which in modelling terms includes the numbers of crew and vehicles used to deliver the collection services).

Put simply, the baseline model should accurately reflect the Corporation's current:

- recycling composition and tonnages;
- demographic characteristics (household numbers, population, housing types);
- travel logistics (distance, pass rate); and
- current vehicle and container types and costs.

This creates a sensible basis from which to establish the change in resource requirements for different potential future service configurations, ensuring that the Corporation's specific constraints are properly reflected.

The likely performance of new schemes is then driven by comparing the authority's collection pass rate with an expected value based on data available from other authorities operating similar schemes, and factoring in the extent of urban and rural collections within the authority – the City of London is 100% urban. This pass rate factor, which reflects the actual number of properties from which material may be collected on a round, is then used to generate expected pass rates for alternate collection approaches. This dictates the expected level of resources needed to undertake collections.

The model automatically builds up the costs associated with the baseline and future schemes based on unit cost data extracted from a database. The numbers of vehicles, containers, and crew required are multiplied by the unit costs to derive an overall cost for the baseline and each future scheme option in turn.

Alongside this, separate standard assumptions are made regarding recycling compositions and yields and within different collection systems and frequencies. These are combined with material, vehicle and crew financial information, using the Corporation's own data wherever possible, in order to calculate expected net system costs.

Annual costs include the amortised cost of capital using standard depreciation periods and interest rates. The model for the Corporation does not include costs such as spare vehicles, supervisors, depot costs, overheads, and internal recharges. Since the total baseline cost is not being developed in the scope of this project, only relative costs are reported in the results sections below.

5.2 Options Modelled

Because of the housing stock in the City of London and the very limited storage space available to residents for waste receptacles, the City has a highly unusual waste collection system, with some households able to receive collections six days per week both from the doorstep and communal bins. Other estates receive collections two days per week and more frequent collections from the communal bins, whilst other residents use only communal bins for waste and recycling.

These restrictions make the development of a workable multi-stream recycling collection system unusually difficult. It would not be reasonable to expect most residents to make use, for example, of normal 55L boxes from which recyclables could be sorted as these would be impractical as well as potentially posing health and safety risks due to storage issues; and the stillage vehicle ('RRV') collection vehicles that would typically be used for multi-stream collections would be unsuitable for emptying communal bins of source separated recycling. It would also be impossible in the majority of cases to fit four recycling bins into the footprint occupied by the current communal co-mingled recycling bins.

A number of options were considered, including the replacement of the current transparent recycling sacks with up to four different coloured sacks, which would then be placed in the same bins and/or collected in the same standard RCVs as at present, while relying on subsequent automated or manual separation of the sacks by colour to deliver the effect of separate collection – a model used in several urban areas in Norway.

However, we are concerned that this would be likely to be an ineffective model. It is likely that there would be significant cross-contamination through split bags; and it would be profoundly difficult to communicate to residents the reason why they were being asked to carefully separate materials into bags that were then to be placed in the same bin/vehicle; this would be likely to lead to poor levels of compliance with the scheme by residents.

We do not consider it likely that it would be acceptable in terms of service for householders that currently receive a daily service for recyclables to move to an

“alternate daily” system, which would require them to keep certain recyclables in sacks in the home overnight. Were this acceptable, the Corporation would be likely to have adopted somewhat less frequent collections in respect of its current mixed recycling system.

We have therefore modelled the following options, set out in Table 5-1.

Table 5-1: Options Modelled

Option	Dry Recycling	Food Waste	Residual Waste
Baseline	Collections of co-mingled material using Corporation-supplied clear sacks 2-6 days per week from most properties, with most material collected from communal bins	Caddy collected at same frequency as dry recycling for City estates with doorstep collections. Private blocks receive weekly collection from communal bins and some households do not receive food waste service (no bin store).	Collections of residual waste using resident-supplied sacks 2-6 days per week from properties with bin stores. Properties without bin stores, receive Corporation-supplied white sack collected 6 days per week.
Option 1 - Separate Collection	Three-stream collections of paper/card, plastic/metal and glass in Corporation-supplied coloured sacks 2-6 days per week from most properties, or from communal bins.	Same as baseline	Same as baseline
Option 2 - Separate Paper	Two-stream collections of paper/card, separate from other material in Corporation-supplied coloured sacks 2-6 days per week from most properties, or from communal bins.	Same as baseline	Same as baseline

The separate collection system proposed (Option 1) employs three-streams:

- Paper/card;
- Glass; and
- Plastic/metals (cans, aerosols, etc).

This approach is intended to be readily used by as many householders as possible.

Paper and card are widely collected together and can be sorted to a good standard. Many “source separated” collection systems in fact collect plastics and metals together, since they too can be separated from one another with a high degree of accuracy.

For householders who currently do not have access to communal bins, the system would require them to use three different coloured sacks. This would clearly be less convenient than the current system, but many households would not need to use all three colours every collection day. For householders that use communal bins, we propose that wherever space permits, the current single large bin should be replaced with three smaller wheeled bins occupying approximately the same footprint. If possible, the bin for paper and card should be slightly larger than those for the other materials to reflect the likely space requirements.

For properties where there is insufficient room for three bins, it is suggested that no glass bin be provided, and that where possible mixed glass bring banks be installed as nearby as is feasible; these could be emptied on the same round as the household collections. In properties where space is extremely limited it might be possible to use communal 3BoxStack™ bins, which would allow for collection of glass, paper and card and containers (plastic and cans) materials in separate boxes within a bin with the footprint of a standard 240L bin – although the small amount of containment space available would clearly necessitate very frequent collections.

In order to collect these materials at the current frequency, it would be necessary for an additional splitback vehicle and crew to be employed. Our expectation is that the paper and card would be collected in the standard RCV, while the plastic/cans mix and the glass would be placed in the two chambers of the splitback.

We have priced in the cost of additional depot space – which might need to be obtained in a neighbouring authority if no space is available in the City – for the additional vehicle. It is further assumed that recycling would be bulked within the expanded depot, and that some basic sort line technology would be installed to enable waste the mixed plastic and metals stream to be separated prior to onward sale – a practice carried out by numerous other authorities. Clearly this would be a significant logistical challenge, and could not take place within the current depot. However, it is not wholly impracticable.

The two-stream collection system proposed (Option 2) involves separating paper and card from the other dry recycling in order to improve the quality and value of the fibre stream:

For householders who currently do not have access to communal bins, the system would require them to use two different coloured sacks. This would be somewhat less convenient than the current system, but many households would not need to use both colours every collection day. For householders that use communal bins, we propose that, the current single communal bin should be replaced with two smaller wheeled bins or stacked containers occupying approximately the same footprint.

In order to collect these materials at the current frequency, it would be necessary to switch recycling to a splitback vehicle. This would have a lower collection efficiency than the current single stream method, but it is assumed that the rounds could still be accomplished.

We have again priced in the cost of additional depot space so that paper can be bulked at this location.

In both options, all other elements of the service would continue in their current configuration.

5.3 Environmental Model

The PAN model also contains assumptions derived from the Environment Agency's WRATE model regarding the CO₂ emitted and saved through

- the collection and reprocessing of recycling; and
- the benefit derived from avoiding the need for virgin materials

to provide a proxy for the overall environmental impact of different collection systems. This enables the environmental practicability of different collection options to be considered.

6.0 Necessity Test

This section addresses the 'necessity test', and seeks to establish whether separate collection of waste streams is, in the words of the Waste Regulations, "is necessary to ensure that waste undergoes recovery operations in accordance with Articles 4 and 13 of the Waste Framework Directive and to facilitate or improve recovery". If separate collection is not necessary, the law does not require it.

There is no definition of "facilitate" or "improve" given in the Waste Framework Directive, the Regulations or any guidance document. However, the Waste Regulations Route Map advises that:

- "Facilitate" means to make possible or easier. If a measure "facilitates" recovery, it might be expected to result in the amount of material recovered rather than sent for disposal being increased.
- Recovery is "improved" if it achieves better results. Recovery may therefore be "improved" if:
 - more waste is recycled rather than subject to other recovery; and/or
 - more of the recycling is "high quality".

6.1 Facilitating Recovery

If a separate collection system facilitates recovery, the quantity of material expected to be recycled should increase when it is implemented. Predicting the results of a collection system so unusual as that proposed for the City of London is difficult, but based on the closest approximations within our experience, the expected tonnage of recycling collected as a result of the separate collection approach is compared with the baseline in Table 6-1.

Table 6-1: Dry Recycling Collected Compared with Baseline (tonnes/year)

Material	Baseline – Co-mingled	Option 1 – Separate Collection	Option 2 – Separate Paper
Co-mingled	808	0	0
Mixed Glass, Metals and Plastic	0	0	341
Mixed Paper & Card	0	385	427
Glass	0	145	0
Mixed Plastic and Cans	0	101	0
Total Dry Collected	808	632	768
MRF Rejects	-65	-5	-31
Total Dry Recycled	743	627	737
Food Waste	96	96	96
Residual Waste	1,520	1,697	1,595

Separate collection is expected to yield 176 tonnes/year less collected material than the current baseline; Option 2 means a 40 tonne/year reduction. This reflects the additional complexity of the collection systems, and as well as the fact that we would anticipate a reduction in the amount of non-target material being collected where materials are separated.

Because the contract with Veolia MRF in Southwark is at an early stage, no data is available at the time of writing regarding the level of rejects from the Corporation's material. However, since no change is being made to the collection system, it is reasonable to assume that the level of input contamination will remain the same, and in the absence of other information we therefore make use of the previous MRF's reject rate. The material rejected by the MRF is added to the Corporation's residual waste. Net of MRF rejects, the difference in performance is reduced, with the current system still performing marginally better than Option 2 (4 tonnes/year) and considerably better than Option 1.

These results indicate that there is no convincing argument that compared with the current baseline separate collection would boost the quantity of recycling in the City of London.

The Regulations state that separate collection is required if it is necessary in order to *facilitate* recovery. The Route Map explains that this can be understood to mean that separate collection is required if it could be expected to yield an increase in the volume of material collected. Our findings indicate that neither two nor three-stream collections would be expected to facilitate recovery.

6.2 Quality of Material

If a separate collection system *improves* recovery, the *quality* of material expected to be recycled should increase when it is implemented. In common with many other authorities, the Corporation has not previously made a detailed assessment of the quality of the recyclate that would result from different collection systems.

There are several possible definitions of ‘high quality recycling’ that the Corporation might consider:

1. Article 11 of the Directive appears to define ‘high quality’ in terms of “the necessary quality standards for the relevant recycling sectors”. This can be understood in three main ways:
 - a. Some have argued that any recyclable material for which an off-taker can be found must of necessity meet the standards of some part or other of the recycling sector. Therefore, all recycling is high quality – only if recyclate is so poor that it cannot be recycled at all would it fail to qualify.
 - b. If the Corporation’s material attracts premium prices, this might be indicative of it being high quality.
 - c. Alternatively, the Corporation could compare the purity of its MRF outputs with the input specifications of UK reprocessors.¹⁰ Materials that meet the reprocessors’ standards could be deemed to be high quality. This is a lower-risk approach, but sets a standard that many MRFs seem likely to find it difficult to meet.

2. Section 4.3.4 of the Commission’s guidance on the Waste Framework Directive relates “high quality” to the standards achieved through separate collection. It gives two somewhat different statements, advising that separate collection is not necessary if:
 - a. “the aim of high-quality recycling can be achieved just as well with a form of co-mingled collection”. This suggests that co-mingled collection can be used only if the resulting material can be recycled in just the same way as separately collected material, i.e. there is no use to which it cannot be put that separately collected material could be; and
 - b. “subsequent separation can achieve high-quality recycling similar to that achieved with separate collection”. This suggests that some minor differences in the recycling achieved may be permissible.

Of course, one of the key determinants of quality is the end use to which material is put. We have received information regarding the end destinations of material from the Veolia MRF at Southwark. This lists a range of paper mills and glass, metal and plastics reprocessors, and indicates that significant amounts of

¹⁰ Resource Association *Recycling Quality Specifications*, accessed 5 August 2014, <http://www.resourceassociation.com/recycling-quality-specifications/>

material go to closed loop recycling. However, the information does not indicate the proportion of the material that goes to closed loop or open loop uses.

In order to properly assess whether separate collection is necessary in order to improve the quality of recycling, the Corporation would need to obtain an assessment of the quality of the final recyclate outputted from its MRF so that this can be compared with the likely purity of a separate collection system. Because the MRF contract with Veolia is sufficiently new that no output purity figures have yet been reported. However under recent amendments to the Environmental Permitting Regulations (the so-called MRF Regs), larger MRFs will be required to undertake regular sampling of their output streams.¹¹ It should therefore be possible for the Corporation to obtain information regarding output purity from the MRF in the near future, and the Corporation should make clear that it would like to receive this information as soon as possible.

In the short term, it is possible to use reasonable estimates of the output purity as the basis for an assessment. The figures we deem most applicable to the Corporation's collections appear in bold in

¹¹ HM Government (2014) *The Environmental Permitting (England and Wales) (Amendment) Regulations 2014*, 10th February 2014, http://www.legislation.gov.uk/uksi/2014/255/pdfs/uksi_20140255_en.pdf

Table 6-2 **Error! Reference source not found.** The table also contains two quality criteria – the typical performance of separate collection and the reprocessor quality standards specified by the Resource Association. Where the Corporation’s material meets or exceeds the standard, it is highlighted in green; where it contains more contaminants than the standard, this is highlighted in red.

Table 6-2: Contamination Rates Used in Model

Material	Typical MRF ¹²	Quality Criterion: Separate Collection ¹³	Quality Criterion: Reprocessor Specification ¹⁴
News and PAMs	9.8%	1.1%	1.0%
Paper	15.8%	0.9%	3.0%
Card	12.0%	4.1%	3.0%
Glass	10.4%	0.4%	1.0%
Mixed Plastic	15.8%	2.9%	6.0%
Aluminium	2.5%	1.0%	3.0%
Steel	6.2%	3.0%	N/a

The sack-based separate collection system proposed for the City of London is unlikely to perform as well as the kerbside sort separate collections used in other areas of the country, since material will not be hand sorted from boxes by operatives. Nevertheless, there would be more scope for them to visually inspect material during the collection process than with the co-mingled collections currently in use. The contamination rate for materials collected co-mingled would be expected to be at least double the typical separate collection figures. However, this would still be an improvement over the anticipated MRF results. If Option 2 were to be pursued, contamination rates for the separate paper and card would be expected to be the same as in Option 1, but the glass, plastics and metals would be little improved, especially if the same MRF were to be used as in the baseline.

The expected results for the current co-mingled material outputs can be seen to be likely to fall below the quality of typical separate collection in all cases, and below the Resource Association specifications for all materials other than aluminium. Therefore, unless the Corporation's MRF outputs prove in practice to be very pure, the Corporation would be likely to conclude that separate collection would *improve* recovery if it were to rely on any definition of "high quality" more taxing than 1) a or b above.

¹² Enviro Consulting (2009) *MRF Quality Assessment Study*, Report for WRAP, November 2009

¹³ Zero Waste Scotland (2014) *Contamination in Source-separated Municipal and Business Recyclate in the UK 2013*, March 2014, <http://www.zerowastescotland.org.uk/sites/files/zws/Contamination%20in%20source-separated%20municipal%20and%20business%20recyclate%20in%20the%20UK%202013%20240314.pdf>

¹⁴ Resource Association *Recycling Quality Specifications*, accessed 5 August 2014, <http://www.resourceassociation.com/recycling-quality-specifications/>

Recommendation 5: Further work to obtain actual MRF output data would allow a reassessment of whether separate collection is necessary in order to improve recovery. The Corporation will need to reach a view on what it considers to be “high quality recycling”.

6.3 Conclusions

On the basis of the modelling undertaken and the information provided by the Corporation:

- it appears that neither a separate collection nor a separate paper system would be expected to increase the amount of recycling collected. Separation is not therefore “necessary” (in the technical language of the Regulations) to *facilitate* recovery of the four materials;
- however, depending on the view taken on the definition of “high quality recycling” it appears that separate collection may be necessary (in the technical language of the Regulations) in order to *improve* recovery of materials; but
- MRF-specific contamination data, if available in the future, may allow the Corporation to revisit the question of whether separate collection is necessary in order to *improve* recovery.

Separate collection is necessary if it will either facilitate or improve recovery. The results therefore indicate that separate collection is necessary in the terms set out in the Regulations. We therefore move on to assess whether separate collection is practicable.

7.0 Practicability Test

The Practicability (TEEP) Test examines whether separate collection would be technically, environmentally and economically practicable. It must be practicable in all three respects in order for it to be required. However, for something not to be practicable is a ‘high hurdle’.¹⁵ It isn’t the same as it being difficult or inconvenient.¹⁶

7.1 Technical Practicability

The European Commission guidance on the Waste Framework Directive says that:

¹⁵ Defra, Letter to Local Authority Bodies on the Separate Collection of Waste Paper, Metal, Glass and Plastic, October 2013, p2.

https://www.gov.uk/government/uploads/system/uploads/attachment_data/file/250013/waste-seperate-collection-201310.pdf

¹⁶ Compare UK Recyclate Ltd and Others v Secretary of State for Environment, Food and Rural Affairs and Welsh Ministers, Royal Court of Justice, Case No. CO/6117/2011, paragraph 18

“Technically practicable’ means that the separate collection may be implemented through a system which has been technically developed and proven to function in practice.” (Section 4.3.4)

There is a history of kerbside sort collections being operated in both urban and rural settings, across a wide range of authorities. Unlike many other waste collection authorities, the City of London has not previously operated a form of separate collection, and the exceptionally high prevalence of flats and profound limitations on storage space for residents in the City mean that the established method of collecting material in boxes to be sorted onto a stillage vehicle is not practicable for the Corporation.

Devising an alternative separate collection system that would be workable in the City is challenging. However, there is an interplay between technical and economic practicability. Many technical issues with separate collection – for example, concerns regarding access or the storage space householders have available – are capable of being addressed, provided that sufficient resources are dedicated to the task.

We have taken these constraints into account in the development of our proposed options, as discussed in section 5.2. Whilst these differ from standard kerbside sort collections, they rely on established collection technologies, tailored to the specific circumstances of the City. While a number of points of detail would remain to be resolved if such a system were to be implemented, our view is that it is difficult to determine at this point that they are in principle insurmountable.

Whilst there are legitimate concerns regarding whether separate collections would be technically practicable in the City, it is not clear that these are fatal to the idea that such a system could be technically practicable. It therefore remains to explore whether separate collections would be economically and environmentally practicable.

7.2 Economic Practicability

The European Commission guidance on the WFD says that:

“Economically practicable’ refers to a separate collection which does not cause excessive costs in comparison with the treatment [including recycling] of a non-separated [co-mingled or residual] waste stream, considering the added value of recovery and recycling and the principle of proportionality.” (Section 4.3.4)

‘Economically practicable’ does not therefore mean ‘the cheapest option’. Separate collection will be economically practicable so long as the cost is not excessive, or disproportionate to the benefits. Except where any extra costs of separate collection are very small or very large, assessing ‘proportionality’ is not straightforward. It may not be sufficient to show, for example, that the extra costs would marginally exceed the current waste budget. It may even be proportionate to consider cuts to other discretionary expenditure in order to meet the legal obligations regarding separate waste collection.

7.2.1 Modelling Results

Eunomia has used its collection options appraisal tool in order to assess whether either three-stream collection (of paper/card, glass, and plastics/metals) or two-stream (of paper/card and other recyclable materials) may be economically practicable. The results of the economic modelling are set out in Table 7-1.

Table 7-1: Financial Performance of Collection Systems (£s)

	Baseline – Co-mingled	Option 1 – Separate Collection	Option 2 – Separate Paper
Vehicles	199,439	260,176	202,771
Staff	177,078	240,799	177,078
Additional Depot	0	250,000	100,000
Receptacles	42,625	124,369	83,497
Material Costs/ Income	2,425	-34,966	-20,319
Organics Processing	6,533	6,533	6,533
Residual Treatment	183,860	204,618	192,892
Net Cost	611,959	1,051,528	742,453

The modelling undertaken shows that separate collection (Option 1) would be 71.8% more expensive than the current baseline service. Separate paper would be 21.3% more expensive. Although the separate materials would yield an income, the relatively small amount of material available to be collected means this would be outweighed by additional collection, residual treatment and depot costs.

Whilst the additional costs of separate collection may be significant, if the Corporation proposes to argue that separate collection is not economically practicable, it would need to evidence not just that there would be additional expense and financial risk under separate collection, but that this would represent an excessive operational cost.¹⁷ This entails consideration of the balance between the costs and the benefits (including the environmental benefits) of separate collection; and of the Corporation's financial position, which will have a considerable bearing on whether it could reasonably meet any additional costs.

Alongside the operational costs of different collection models, the adoption of a separate collection system in place of a co-mingled system or two-stream system might result in transitional costs such as recruiting staff, setting up new materials

¹⁷ European Commission (2012) *Guidance on the Interpretation of Key Provisions of Directive 2008/98/EC on Waste*, June 2012, http://ec.europa.eu/environment/waste/framework/pdf/guidance_doc.pdf

contracts and legal and compensation costs associated with halting or amending the current contract with Amey, which runs to 2019. The Corporation may wish to identify these costs. We would recommend that operational costs should always be viewed separately from transition costs in assessing economic practicability. It appears legitimate for an authority to recognise that, operationally, separate collection might be economically practicable, whilst taking the view that contractual, infrastructural or capital considerations make change impossible in the short term.

Economically, separate collections seek to balance an investment in additional collection vehicles against a saving in sorting costs and higher material incomes. Achieving good material incomes may be more difficult for the City of London as a collector of relatively small quantities of recycling, but the proximity of numerous offtakers may mitigate this risk. As a result of the additional investment in collection infrastructure, the economics of separate collections are more heavily dependent on securing good material incomes than, typically, is a co-mingled collection. Therefore, if separate collections were introduced, the Corporation would be exposed to a degree of financial risk associated with future material values, from which it is at present shielded through its fixed price MRF contract.

Recommendation 6: In the context of this options appraisal and its financial circumstances, the Corporation should consider what level of expenditure on waste services is affordable, and what would qualify as “excessive cost”.

Recommendation 7: The Corporation may wish to assess the extent to which its contract with Amey can be exited or amended. If this cost is excessive, then this might constitute a further reason for deferring any change until procurement of a new contract is due in 2019.

7.2.2 *Conclusions*

On the basis of the modelling undertaken and the information provided by the Corporation:

- it appears that both separate collection and separate paper would be more expensive than the baseline collection system;
- because of the higher reliance on material sales income within separate collection systems to offset the additional operational costs of collection, increasing the level of separation will bring an inherently greater economic risk compared with co-mingled collections;
- the difference between the costs of the systems may be sufficiently large so as to make it likely that the either the two-stream or the three-stream system would represent the ‘excessive cost’ that guidance indicates makes separate collection economically impracticable.

If the Corporation were to rely on the argument that separate collection is not economically practicable, it would need to ensure that a clear, high level decision was reached regarding the level of expenditure on waste collection (plus any agreed knock-on costs and material income risk) that is acceptable. The Corporation would need to explicitly take the view that the level of additional

expenditure would, in its circumstances and in the light of the environmental performance of different collection systems, represent an ‘excessive cost’.

7.3 Environmental Practicability

The European Commission guidance on the WFD says that:

“Environmentally practicable’ should be understood such that the added value of ecological benefits justify possible negative environmental effects of the separate collection (e.g. additional emissions from transport).”
(Section 4.3.4)

A system will therefore be environmentally practicable if the benefits from increased or improved recycling outweigh any negative impacts. However, this test is likely to be met by almost any recycling collection system, since the benefits achieved through recycling should almost always outweigh the environmental impacts of its collection and processing.

7.4 Modelling Results

The results of the environmental modelling are shown in Table 7-2.

Table 7-2: Environmental Benefit of Collection Options (Tonnes of CO₂e/yr)

	Baseline – Co-mingled	Option 1 – Separate Collection	Option 2 – Separate Paper
Dry Recyclables	258	341	336
Organics	16	16	16
Transport	-17	-22	-17
MRF	-16	0	-7
Net Carbon Benefit	241	334	328

As anticipated, each collection system meets the minimum practicability requirement of its costs being outweighed by its benefits. The greatest net benefit comes from Option 1, yielding 38.7% more net carbon benefit per year than the current baseline service. Although transport emissions are higher, the benefit from the increased benefit from the separate dry recyclables and the avoidance of using a MRF result in a greater net environmental benefit.

7.4.1 Conclusions

The results of the modelling show that separate collection is environmentally practicable, and outperforms the current approach by a significant margin.

8.0 Conclusions

8.1 Overview

At present, a good deal remains uncertain regarding how the Waste Regulations will be enforced. The Environment Agency has begun to outline its approach to enforcement, but has not yet indicated how active it proposes to be in its role as the enforcement body for this legislation; nor have any third parties disclosed an intention to seek to clarify the requirements of the law by pursuing legal action against authorities.

As a result, there is a risk that some authorities may act in anticipation of enforcement action that may not in practice be forthcoming; there is also a risk that some authorities may do too little, and find themselves subject to attention from either the Environment Agency or third parties that results in them needing to make changes. For authorities that have followed the Waste Regulations Route Map process and acted on the findings, the likelihood of these risks emerging is in all probability low, although the impact of enforcement, and the need to make change in some haste, may be high.

Our recommendations here are intended to set out a course of action that the City of London Corporation can pursue that will help to minimise these risks. Authorities that have set out a clear path towards compliance will have a reasonable position to rely on if challenged regarding their approach to the Regulations, but can avoid taking action that may be precipitate.

8.2 Regulation 12: Waste Hierarchy

Our review suggests that the waste hierarchy has been given due consideration in the design of the City of London Corporation's service, although it would be sensible to ensure that the work it carries out in this area is actively tracked and monitored through its Recycling Action Plan.

With a small amount of further work to check that a full range of actions has been considered and the most effective ones implemented, the Corporation will be in a good position to respond effectively to any hierarchy-based legal challenges that can reasonably be envisaged.

Recommended actions which the Corporation may wish to consider in relation to the waste hierarchy are listed in Appendix A.4.1.

8.3 Regulation 13: Separate Collection

8.3.1 Necessity Test

The analysis carried out indicates that separate collection of the four materials:

- does not appear to be necessary in order to *facilitate* recovery, since it would not increase the amount of material captured;
- appears likely to be necessary in order to *improve* recovery, assuming that:

- the term “high quality” is interpreted in one of the more demanding senses set out in section 6.2, whereby the MRF outputs are assessed against reprocessors’ published input requirements, or to mean rejected as too risky to rely on; and
- the Corporation’s MRF output contamination rates are similar to those modelled, as council-specific data regarding its new MRF was not available.

Due to recent amendments to the Environmental Permitting Regulations, it may be that output quality data will become available from the MRF in the near future. The Corporation may wish to revisit the necessity test when this is the case.

There are interpretations of “high quality” available that the outputs from the Southwark MRF would be likely to be consistent with, and the Corporation may wish to consider whether it is happy to accept such a definition. If it decides that separate collection is not necessary in order to *improve* recovery, separate collection would not pass the necessity test.

8.3.2 *Practicability Test*

There are legitimate concerns as to whether a technically practicable approach to separate collections is available given the nature of the City’s housing stock. Lack of storage space and a heavy reliance on communal bins mean that a system using stillage vehicles would not be workable. However, it is plausible (if not entirely certain) that, with sufficient resources, a collection system could be implemented that would rely on established collection methods (sacks, communal bins, RCVs) but would achieve a substantially greater level of separation than at present.

The modelling work carried out on two such collections indicates that they would be environmentally practicable. However, there is a clear argument that it may not be economically practicable based on the findings that:

- separate collection would be 71.8% more expensive than the Corporation’s baseline option; and
- separate collection would expose the Corporation to greater financial risk in the event of a downturn in the secondary materials market.

There may be additional costs that the Corporation might identify that could be associated with operating a separate collection system, including the transitional costs of amending its contract with Amey.

Recommendation 8: The Corporation may now wish to gain appropriate internal sign-off for the proposition separate collection is necessary, technically practicable and environmentally practicable; to decide whether the additional costs and inherent financial risk amounts to making it not economically practicable, by virtue of representing an ‘excessive cost’; and to decide if there are financial reasons why a transition to a separate collection system might in any case not be feasible in the short term.

APPENDICES

A.1.0 Supporting Information Provided by the Corporation

The following tables present a gap-analysis of information provided by the Corporation in response to a proforma supplied by Eunomia. The information is of two main kinds:

- Key data that would be required in order for the Corporation to undertake an options appraisal comparing the performance of separate collection with that of any preferred collection model (e.g. the Corporation's current approach), an essential part of the Route-map process; and
- Evidence of policies and decisions made by the Corporation regarding which materials will be collected and the collection method to be employed, to examine whether the reasoning and evidence supporting the decisions is consistent with the Route-map's interpretation of the Regulations.

Each element of information required is described in the left hand column(s). The relevant evidence provided by the Corporation is recorded (short summaries of policies are included), and where the evidence is supported by a document a reference number is provided in square brackets. A key to the reference numbers can be found in Appendix 0. The final column records Eunomia's assessment of the evidence. This may be:

1. Complete: The Corporation has the required information and this is of a standard to enable it to be relied on in an assessment of compliance;
2. Work Required: The Corporation has relevant information, but it is either incomplete or requires some additional input to enable it to be relied upon; and
3. Absent: The Corporation was not able to provide the required information.

A.1.1 Regulation 12: Waste Hierarchy

A.1.1.1 Waste Hierarchy Checklist: Written Evidence of Policies and Decisions

Table A - 1: Written Evidence of Policies and Decisions Required for Waste Hierarchy Compliance Evaluation

Descriptor	Sub-Descriptor	Document	Description	Rating
Policy/decision regarding waste hierarchy approach to each waste stream (refuse and recycling)	Household	[1, 9]	Document 1 describes the current collection system and sets out the Corporation's aim to increase reuse and recycling and reduce waste arising, clearly indicating waste hierarchy awareness [1] Document 9 confirms the operation of a push bike reuse/recycling scheme	Work Required [Ensure each waste stream is tackled explicitly in the Recycling Strategy]
	e.g. HWRCs	[1]	There are no HWRCs in the Corporation. Residents can use neighbouring council facility	N/A
	e.g. Bulky	[1,4,13, website]	The Corporation provides bulky waste collections where residents can either phone up for a collection (£27 for up to 3 items or 10 bags) or take their items to the bulky waste storage area on estates where this is available [1] The Corporation also operates a bulky reuse collection where residents phoning in for a collection of a reusable bulky item are transferred to London Re-Use	Work Required [Provide rationale for non-recycling of bulky waste]

Descriptor	Sub-Descriptor	Document	Description	Rating
			Network [1,4]	
	e.g. Commercial		The Corporation does not provide a commercial collection service	N/A
	e.g. Street sweepings	[1,11]	Street sweepings are part recycled using split compartments in sweeper barrows to collect co-mingled recycling (paper, glass, plastic bottles and cans. Mechanical one stream vehicles are also used [1,11]	Complete
	e.g. Litter bins	[1]	On street recycling bins for mixed recyclables and paper were trialled but withdrawn [1]	Work Required [Ensure evidence is in place to justify withdrawal]
Written policy/decision regarding the waste hierarchy approach to each material type	Dry recycling types	[1]	Document describes strategy to increase recycling [1]	Work Required [Ensure strategy also discusses prevention options]
	Batteries	[1]	Partnership arrangements with third party organisations to collect batteries from the recycling banks located on four main housing estates and public locations e.g. libraries[1]	Work Required [Consider how effective this approach is, and ensure rationale is in place for not implementing near entry or doorstep collections]
	Soil		Likely to be received mainly at HWRCs in neighbouring council	N/A
	Wood		Likely to be received mainly at HWRCs in neighbouring council	N/A
	Textiles	[1]	Partnership arrangements with	Work

Descriptor	Sub-Descriptor	Document	Description	Rating
			third party organisations to collect textiles from the recycling banks located on our four main housing estates [1]	Required [Consider how effective this approach is, and ensure rationale is in place for not implementing near entry or doorstep collections]
	Clinical		Corporation provides a free clinical waste collection service to residents	Work Required [Determine how clinical waste is treated, and confirm this is in line with waste hierarchy]
Evidence of actions taken to apply the waste hierarchy	Prevention/reduction		Details provided in Table 3-1	Work Required [Ensure clear forward programme of work is in place]
	(Prep for) Reuse		Details provided in Table 3-1	Work Required [Ensure clear forward programme of work is in place]
	Recycling		Details provided in Table 3-1	Complete
	Energy recovery	[1]	EfW facility became fully operational in 2011. Percentage of waste landfilled fell from 75 to 21% between 2010 and 2011 [1]	Complete

A.1.1.2 Waste Hierarchy Data

Table A - 2: Data Required for Waste Hierarchy Compliance Evaluation

Descriptor	Sub-Descriptor	Data and Source	Rating
Do you hold waste composition data?	Residential	[3,8]	Complete
	HWRC	N/A	N/A
	Bring sites	N/A	N/A
Have you quantified the impact on waste arisings of:	Waste prevention activities		
	Preparation for reuse		
Do you hold details of the tonnage of each material sent for:	Recycling	[14a,b]	Complete
	Energy recovery	[3]	Work Required [Establish fate of clinical waste, seek information on composition of residual waste to establish effectiveness of recycling system in diverting recyclable materials]
	Disposal	[3]	Complete

A.1.2 Separate Collections Checklist

A.1.2.1 Key Data Regarding Waste Service: Collections

Table A - 3: Key Data Regarding Current Collection System

Descriptor	Sub-Descriptor	Data and Source	Rating
Demographics	Households served	6,500	Complete
	Households in rural areas	0	Complete
	Households in private blocks	2400	Complete
	Other properties with very limited storage	6500	Complete
	Other households that present particular collection issues	850	Complete
Is your domestic collection system:	Co-mingled?	YES [1]	Complete
	Do you separately collect:		
	Glass?	NO	N/A
	Metal?	NO	N/A
	Paper/card?	NO	N/A
Do you also collect waste from any other sources?	Plastic?	NO	N/A
	e.g. Commercial	NO	N/A
	e.g. Bulky	YES [1]	Complete
	e.g. Bring sites	YES [1]	Complete
	e.g. HWRCs	NO	N/A
How is your current collection service provided	e.g. Streets and Litter	YES [1]	Complete
	In house	NO	N/A
	Outsourced	YES [1]	Complete
	Standard RCV (Refuse)	1	Complete
	Standard RCV (Recycling)	1	Complete
	Standard RCV (Food waste)	1	Complete
	Dry recycling doorstep van	1	Complete
	Standard RCV (residual Saturday, shared with	1	Complete

	Commercial)		
	Time-banded residual (shared with commercial 3.5-7.5t cage or alternative)	1	Complete
Please specify the containers that are typically issued to households	Refuse	850 households receive free residual waste bags Other properties have communal bins (from 240L to 1100 L)	Complete
	Recycling	Free clear recycling bags to all properties "All other properties have communal bins; ranging from 240ltr to 1100ltr dependent on property/bin store"	Complete
	Food	5L internal caddy and bin liners	Complete
	Other	850 properties do not have a bin store, and receive evening collection service 6 days week Privately managed flats and all estates have communal co-mingled bins	Complete
How many households have non-standard receptacles?	850		Complete
What is the full annual net cost of your collection system?	Outsourced		Complete
Are any significant collection service changes planned?	NO		Complete

A.1.2.2 Disposal

Table A - 4: Basic Information Regarding Current Disposal/Treatment Arrangements

Descriptor	Sub-Descriptor	Data and Source	Rating
Where do you initially tip...	Refuse	Walbrook Wharf, 79 – 83 Upper Thames Street, London, EC4R 3TD	Complete
	Dry Recycling	Southwark IWMF 43 Devon Street SE15 1AL	Complete
	Food Waste	Southwark IWMF 43 Devon Street SE15 1AL	Complete
	Garden Waste	N/A	N/A
Do you use a MRF to separate any materials that are collected co-mingled?		Southwark IWMF 43 Devon Street SE15 1AL	Complete
Do you send any material for energy recovery (this includes material from MRFs)		All residual to Riverside Resource Recovery, Belvedere, Bexley	
What are your gate fees/income for:	Refuse (including landfill tax)	£120.97 (increases by RPI each year. Contract until 2025)	Complete
	Dry Recycling	£3 per tonne	Complete
	Food Waste	£68	Complete
	Other materials	Clinical (£566.91)	Complete
Do you receive any recycling credits or avoided disposal payments or tipping away fees for material diverted?		No	N/A
What is the full annual cost of your disposal/treatment system?		£500,000	Complete
Are any significant disposal/treatment changes planned?		No. Recently initiated the services of a new MRF.	Complete

A.1.2.3 Separate Collection Checklist: Written Evidence of Policies and Decisions

Table A - 5: Additional Written Evidence of Policies and Decisions Required for Separate Collection Compliance Evaluation

Descriptor	Sub-Descriptor	Description	Rating
Have you made any assessment of	whether separate collection of the four materials would lead to an increase in quantity of recyclate collected	None	Absent
	whether separate collection of the four materials would lead to an increase in the quality of recovery (more, or better recycling)	None	Absent
Technical practicability	Have you looked at how separate collection could be implemented for hard to serve households (e.g. other authorities' best practice)?	None	Absent
Economic practicability	Have you undertaken a comparison of the full costs to the Corporation (including the benefit of material incomes) of separate vs co-mingled collection?	None	Absent
Environmental Practicability	Have you undertaken a comparison of the environmental impact of separate vs. co-mingled collection, including, for example, energy use in haulage and MRF operations?	None	Absent

Table A - 6: Additional Data Required for Separate Collection Compliance Evaluation

Descriptor	Description	Rating
If you have contracted out collection or disposal/ treatment work, what assessment has been made of the costs of breaking or amending the contract?	A new memorandum of understanding with Amey would be required; there would be a cost to this, but as yet unknown.	Work required
Do you hold information regarding the outputs from any MRF that you use, including details of rejects and of the purity of the outputs?	The MRF contract is new, and information has not yet been received	Work Required
Do you hold any information regarding the end destination of material that is sent through the	List of reprocessors has been supplied by MRF. but could usefully be supplemented with	Complete

MRF?	details of quantities of each material to closed loop uses [15c]	
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Table A - 7: Comparative Information on Separate Collection

Descriptor	Sub-Descriptor	Evidence	Rating
What assessment has been made of the comparative number/cost of the following items for separate collection?	Vehicle requirements	None	Absent
	Crew requirements	None	Absent
	Depot costs	None	Absent
	Likely diversion rate	None	Absent
	Containers	None	Absent
	Material gate fees and disposal costs	None	Absent

A.2.0 Additional Tables

A.2.1 Materials

Table A – 8: Breakdown of Material Tonnages (Tonnes)

Material	Baseline – Co-mingled	Option 1 – Separate Collection	Option 2 – Separate Paper
Co-mingled	808		
Mixed Containers			341
Mixed Paper & Card		385	427
Glass		145	
Plastic		76	
Steel		19	
Aluminium		7	
Total Dry Collected	808	632	768
MRF Rejects	65	5	31
Food Waste	96	96	96
Residual Waste	1,520	1,691	1,595

Table 9 – Modelled Gate Fees and Material Incomes (£)

Material	Gate Fee
Co-mingled	3.00
Mixed Containers	3.00
Mixed Paper and Card	-50.00
Glass	-15.00
Plastic	-90.00
Steel	-95.00
Aluminium	-750.00
Food Waste	68.00
Residual Waste (inc. LFT)	120.97

Note: Negative gate fees represent an income.

Table A – 10: Breakdown of Material Incomes (£s)

Material	Baseline – Co-mingled	Option 1 – Separate Collection	Option 2 – Separate Paper
Co-mingled	2,425	0	0
Mixed Containers	0	0	1,023
Mixed Paper and Card	0	-19,265	-21,342
Glass	0	-2,179	0
Plastic	0	-6,822	0
Steel	0	-1,776	0
Aluminium	0	-4,924	0

A.2.2 Carbon Factors

Table A – 11: Breakdown of Carbon Factors (Tonnes of CO₂ emitted/saved)

Material/Activity	CO ₂ Impact
Single Stream	-0.35
Containers Only	-0.61
Mixed Paper & Card	-0.34
Glass	-0.20
Plastic	-1.17
Steel	-1.83
Aluminium	-8.70
MRF Glass	-0.07
Food Waste	-0.16
Diesel fuel (litre)	0.0003
MRF operation (per tonne of material processed)	0.02

Note: All figures are based on savings per tonne of virgin material replaced, except as indicated.

A.3.0 Documents Referenced

The table below presents a comprehensive list of data and written evidence of policies and decisions, provided by the Corporation, which would be needed to demonstrate compliance with the Regulations. These documents are referenced to numerically in the report.

Table A - 12: List of Data and Documentation Required for Compliance Check

Document No.	Document Name
1	Final Waste Strategy April 2014 – 2013-2020
2	Confirmation of CoL Service data and additional queries and replies
3	MRF composition summary 2013-14
4	Bulky Reuse Collection Service
5	Park and Open Spaces FAQ
6	City of London Bulky Waste Report
7	Give and Take Days
8	Composition Analysis
9	Bike Swap Confirmation
10a	Restart Pop-Up for Recycling Week
10b	Restart Promotion Plan
10c	Restart Booking Plan
11	Street Sweeper Data
12	LFHW Funded Activities 2013-14
13	Potential Bulky Items Recycling
14a	Waste Collection 2013-14
14b	Waste Collection 2014-15
15a	Final Destination 2013b – Ideal
15b	Final Destinations – Ideal
15c	Final Destinations – Veolia MRF November 2014
Web	City of London Corporation Website

A.4.0 Key Recommendations

A.4.1 Regulation 12: Waste Hierarchy

Recommendation 1: The Corporation may wish to produce and maintain an overview, based on

Table 3-1, to evidence the actions carried out to implement the waste hierarchy and the rationale for their selection.

Recommendation 2: The Corporation may wish to ensure that it has a clear timetable in place showing planned actions relevant to the waste hierarchy.

Recommendation 3: The Corporation may wish to put in place documents that explain its rationale for incineration of certain material streams or state why it is not reasonable to take action to move these materials further up the waste hierarchy.

Recommendation 4: An analysis of the impact of waste prevention and reuse measures would provide the Corporation with further evidence of the effectiveness of the actions they have taken to apply the waste hierarchy; if this is not deemed feasible, the Corporation should record the reasons why.

A.4.2 Regulation 13: Separate Collection

Recommendation 5: Further work to obtain actual MRF output data would allow a reassessment of whether separate collection is necessary in order to improve recovery. The Corporation will need to reach a view on what it considers to be “high quality recycling”.

Recommendation 6: In the context of this options appraisal, the Corporation should consider what level of expenditure on waste services is affordable, and what would qualify as “excessive cost”.

Recommendation 7: The Corporation may wish to assess the extent to which its contract with Amey can be exited or amended. If this cost is excessive, then this might constitute a further reason for deferring any change until procurement of a new contract is due in 2019.

Recommendation 8: The Corporation may now wish to gain appropriate internal sign-off for the proposition separate collection is necessary, technically practicable and environmentally practicable; to decide whether the additional costs and inherent financial risk amounts to making it not economically practicable, by virtue of representing an ‘excessive cost’; and to decide if there are financial reasons why a transition to a separate collection system might in any case not be feasible in the short term.

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Committee(s):	Date(s):
Port Health and Environmental Services	20 January 2015
Subject:	Public
Third Year Performance Review of the Domestic Waste Collection and Street Cleansing Contract	
Report of:	For Information
Director of the Built Environment	
Summary	
<p>This report outlines the performance of the Domestic Waste Collection and Street Cleansing Contractor for the third full year of the contract and the first full year of the contract following the purchase of Enterprise Managed Services (EMS) by Amey plc. Standards remain high with independent audits by Keep Britain Tidy showing another year of performance well above both the national and London average and better than set contract targets.</p> <p>The contractor performance continues to be regularly monitored by officers against a suite of twelve KPIs which are kept under review to ensure they continue to drive the desired performance from the contract, City officers and the contractor, continue to review the way the service is provided to ensure efficient service delivery and a drive towards continuous improvement.</p>	
Recommendation(s)	
Members are asked to:	
<ul style="list-style-type: none"> • Note the report 	

Main Report

Background

1. On 01 October 2011 the City Corporation's new Domestic Waste Collection and Street Cleansing Contract with Enterprise Managed Services Limited (EMS) commenced.
2. Following EU regulatory approval it was announced on 09 April 2013 that EMS had been acquired by Ferrovial S.A. and that EMS's immediate parent company will become Amey (UK) plc. At a local level there was minimal change excepting a rebranding of uniforms and vehicles. This has been the first full year that the contract has been under the management of Amey.
3. The contract is for eight years with an option to extend for another eight years. At the same time the contract for Police and Corporate Fleet Maintenance was also let to Amey (formerly EMS) but that contract is not considered within this report.
4. The contract specification saw a shift in focus from 'input' measures (e.g. the number of staff being specified) towards 'output' performance measures (e.g. the standard of cleanliness achieved). The intention was to avoid over staffing

the contract and to drive efficiencies through measures such as the provision of two sub-depots (Middlesex Street and Smithfield Market) and better utilisation of mechanical sweeping. The contract also included the transfer of the City's loss making commercial waste business to Amey for the term of the contract where after it will be returned to the City for a peppercorn payment.

5. The efficiency and other measures outlined above resulted in an award of contract at an annual revenue saving of £884,000 with the new annual contract value being £3.222 million.
6. This report reviews the performance of the Street Cleansing and Waste Collection elements of the contract for the period from 1 October 2013 to 30 September 2014.

Current Position

7. The third year of this contract has seen a further improvement in performance and standards in the street cleansing and waste operations. In the first full year of Amey managing the contract they have worked closely with City Officers to identify opportunities for more efficient working practices and improvements in the City's street environment standards.
8. Throughout the year the cleanliness of the City has also been independently monitored through sample inspection of our streets by Keep Britain Tidy (KBT). Every four months KBT conduct a series of random inspections based upon the methodology of what used to be a nationally reported performance indicator for street cleanliness (NI 195) based on an aggregated score of four markers (litter, detritus, flyposting and graffiti). Your Committee has set a target of no more than two per cent of streets inspected by KBT falling below the satisfactory standard of cleanliness. The data for the last four inspections is shown below and indicates the best in class across London (the London benchmark figure is 6.09%, the national benchmark is 10.41%)

	October 2013	March 2014	July 2014	October 2014
Target	2.0%	2.0%	2.0%	2.0%
City Score	0.25%	0.63%	0.58%	1.29%

9. Although well below City's own internal target the October 2014 inspection score was above previous levels. Analysis of the survey data showed that this increase was due to the inspections taking place in the east of the City at the same time as the Poppy exhibition at the Tower of London caused increased footfall, litter and made cleansing the area challenging. Although resources were reallocated and adjusted the cleansing operation was restricted by the sheer volume of visitors. However to still come in below the 2% target despite this is a credit to the service.
10. In 2014 Amey carried out a triennial benchmarking exercise, which was a key requirement laid out by the City at tendering stage. The report compared the waste management services provided by Amey for the City of London with those of other Amey contracts throughout the UK to determine how efficient

the contract is across all of its services. A full analysis into all streams of the service concluded that considering the City of London contract was less than 30% into its running time, along with the difficulties associated with working in a densely populated environment, it performs well alongside its counterparts, delivering an efficient and high quality waste management and street cleansing service. Including with the highest customer satisfaction score for Cleanliness of Streets and second highest in both Refuse collection and Recycling services.

11. In addition to this benchmarking exercise in May 2014 the City of London engaged The London Waste and Recycling Board (LWARB) to carry out an efficiency review of its waste management services. This review was part of a London wide efficiencies programme which offered every London Borough a free-of-charge high level review of their services to identify if any significant savings could be made. At the time that the City of London's review was completed LWARB had undertaken 14 reviews covering 20 London Boroughs.
12. The overall feedback from both LWARB was very positive. They recognised the complex nature of the City and the intricate collection schedules and resourcing required servicing these unique needs. They considered our service delivery to be so close to optimum efficiency that they were unable to identify any areas where significant improvements could be made. Therefore they did not recommend progressing their work to a second phase (as they had for all of the other boroughs which they reviewed).
13. The City of London was also recognised for its street cleansing service at the prestigious Clean Britain Awards, which is now in its 25th year and which recognise those local authorities performing at the highest levels in delivering high quality local environments. The scheme helps them to promote their successes and works to raise awareness of the issues caused by litter. The City achieved a Silver Award in the medium population category.

Continuous Improvement Achievements

14. From its inception in 2011 the contract has always strived for continuous improvement, over the past year of the contract there have been a number of changes made to improve efficiency and performance.
15. **Revision of KPIs:** In order to accurately reflect the service and provide more relevant management information, in-line with the provision made in the contract the decision was made to amend two of the contract KPIs. Both of these amendments have been discussed at the Partnership Board and are currently in trial phases to ensure they are robust enough to form part of the suite of KPIs. The amended KPIs include a target time for collection from our solar powered bins once they are shown as being full and the GPS tracking of mechanical sweeper routes to confirm they have completed a pre agreed route.
16. **Health and Safety:** Health and Safety is central to the corporate objectives of Amey and the City of London. Driven by the Target Zero ethos, the City of London contract has risen to the challenge of making the working environment as safe as possible. The renewed focus on Health and Safety

implemented by Amey has seen a dramatic improvement in close call reporting, up 230% from 2012-2013.

17. Joint Bi-weekly depot inspections between CoL and Amey continue alongside the established method of monitoring operative health and safety, the “Inspection Management System” (IMS) carried out both independently by Amey and in joint inspections with the City.
18. In addition to this Amey has introduced a process of Visible Felt Leadership (VFLs). These are intended as informal discussions between the Senior Management Team and operatives, ensuring that safe practice is being followed, and that employees are happy in their working conditions. One of these inspections is required each month.
19. **Service Delivery and Innovation:** The partnership trialled a number of new innovations this year including mobile gum removal packs which can be deployed to focus on specific areas and raise awareness amongst members of the public. As part of a fleet review Ashwood Hybrid vehicles fitted with hybrid technology to provide clearer driver metrics and assist in reducing carbon output were chosen to replace the aging Cabac fleet. Amey are also in the process of trialling limited Sweeper Barrow GPS tracking software.
20. The City has experienced a recent growth in the frequency and size of events such as charity runs and one off public exhibitions such as the poppy display at the Tower of London. In addition to this seasonal variations in weather and visitor numbers and their distribution was identified as an area where cleansing could be improved. In order to manage the inevitable challenges for street cleaning these events and variations in the weather cause, a seasonal beat has been established. This beat is deployed to wherever the need is perceived to be highest and this has proved extremely beneficial.
21. **Best Practice:** As part of an benchmarking initiative amongst several large European Cities that the City has been instrumental in creating, Officers from the City have met with counterparts from across Europe to understand their waste collection and street cleansing services. As a result of the meeting a number of cities have agreed to collate information on cleansing services to establish benchmarks on staffing levels, value for money and equipment. The City was also visited by Ferrovial’s (Amey’s parent company) “Smart Cities” team as they look to share best practices from across the Amey business portfolio.
22. Amey have been utilising their corporate Graduate trainee programme to place graduates on the City of London contract. So far three Graduate Managers have so far worked on the contract and a Trainee Manager (Amey Talent Tracker programme) has been appointed. They have provided valuable contributions to the contract in the development of a number of projects such as contract benchmarking, operational performance management and vehicle availability.
23. Amey have also been very supportive of the City’s objective to reduce road accidents and this year have achieved the Silver Fleet Operator Recognition Scheme (FORS) standard from TfL along with becoming a CLOCS (Construction Logistics and Cyclist Safety) Champion with all their driving staff have now completed the Safer Urban Driving Scheme.

Continuous Improvement – Objectives

24. As part of the on-going desire to improve the service delivered in partnership with our contractors Amey, an annual improvement plan is produced which highlights areas where the contract can be improved in the coming year. The following are key areas which we will be aiming to develop.
25. **Individual staff performance and recognition** the next year of the contract will see the launch of a performance leader board for managers and operatives. This will generate improved statistical and general information on the performance of the contract at street level. This will be complemented by rewards and recognition, in particular for the “Eyes and Ears” element of reporting which aims to embed the practice of defect and incident reporting across all City services the general duties of all cleansing staff.
26. **Driving Further efficiencies** Now that the contract has been running for some years, the partnership feel that it is prudent to carry out a comprehensive review of night time cleansing operation. This will involve an analysis of all work carried out at night to ensure areas are receiving the appropriate frequencies of sweeping and to establish if current resources could be deployed more effectively.
27. **Enhanced Integration of systems** The planned integration of Amey’s Works Manager Interface used to allocate and track the progress of work with City’s Customer Relationship Manager (CRM) system is due to be completed in the coming year. This will allow for easier interrogation of performance information.

Conclusion

28. In summary, Amey have continued to deliver well in terms of overall cleanliness of the street environment. The KPI system is proving effective in driving performance and also enables City officers and the contractor to see where performance needs to be improved.

Appendices

- Appendix 1 – KPI performance table for 2013/14

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Appendix 1 - KPI performance table for 2013/14

		Targets		Oct 13	Nov 13	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14
		'13	'14												
1	Percentage of streets meeting the enhanced Grade A Standard, including removal of all accessible minor graffiti, when inspected within 15 minutes of the nominated daily clean.	96%	97%	98.8 %	99.0 %	98.1 %	97.5 %	98.3 %	98.3 %	98.1 %	98.8 %	98.6 %	99.3 %	97.5 %	97.5 %
2	Number of random inspections recorded per week, within agreed limits for services/days/shifts and a total of at least 800 per month.	800	800	841	861	835	833	861	843	818	832	835	813	818	814
3	Percentage of independent verification inspections (initially 80 per month) that confirm the results of contractor inspections.	90%	95%	91.7 %	98.8 %	100 %	93.8 %	95.2 %	97.6 %	100 %	96.6 %	98.0 %	96.8 %	95.1 %	97.9 %
4	Percentage of urgent service requests that are attended with the required time limit.	96%	97%	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %	100 %
5	Percentage of complaints that are second or subsequent complaints (defined to exclude both duplicate complaints and at the other extreme those more than six months apart).	15%	10%	0%	20%	0%	0%	0%	0%	0%	16%	0%	8%	0%	0%
6	Percentage of shifts from which an accurate feedback report is obtained.	95%	97%	96.2 %	95.7 %	96.7 %	96.8 %	97.5 %	97.6 %	98.4 %	97.5 %	97.9 %	97.6 %	97.5 %	98.0 %

Appendix 1 - KPI performance table for 2013/14

		Targets		Oct 13	Nov 13	Dec 13	Jan 14	Feb 14	Mar 14	Apr 14	May 14	Jun 14	Jul 14	Aug 14	Sep 14
		'13	'14												
7	Number of occasions per month when refuse collection street cleansing vehicles are tracked operating above the optimum speed for cleansing.	4	2	0	0	0	0	0	0	0	0	0	0	0	0
8	Number of defaults issued in the month.	0	0	0	2	0	0	1	0	0	0	0	0	1	1
9	Number of failures to complete scheduled work, allowing if necessary for agreed contingency arrangements contained within the method statements.	0	0	0	0	0	0	1	0	0	0	0	0	0	1
10	Number of changes to working methods implemented without prior agreement or in an emergency, agreed within two hours.	0	0	0	0	0	0	0	0	0	0	0	0	0	0
11	Number of occasions of failing to respond to the urgent client requests for information (highlighted for immediate attention).	0	0	0	0	0	0	0	0	0	0	0	0	0	0
12	Number of pavement collection points found to have bags not collected when the embargo starts.	9	7	1	1	2	1	1	4	7	3	0	9	3	2
	Total passed	10		12	10	12	10	10	12	12	11	12	11	11	10

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