



Port Health & Environmental Services Committee

Date: TUESDAY, 30 MAY 2023

Time: 11.00 am

Venue: COMMITTEE ROOMS, 2ND FLOOR, WEST WING, GUILDHALL

Members:

George Abrahams	Wendy Hyde
Shahnan Bakth	Henry Jones
Alderman Alexander Barr	Elizabeth Anne King
Deputy Christopher Boden	Deputy Natasha Maria Cabrera Lloyd-Owen
Tijs Broeke	Andrew McMurtrie
Timothy Butcher	Deputy Henry Pollard
Deputy Simon Duckworth	Jason Pritchard
Deputy Peter Dunphy	Hugh Selka
Mary Durcan	Oliver Sells KC
John Edwards	Deputy Dr Giles Shilson
Helen Fentimen	Alethea Silk
John Foley	Mandeep Thandi
Deputy Marianne Fredericks	Luis Felipe Tilleria
Steve Goodman OBE	Glen Witney
Alderman Prem Goyal	Irem Yerdelen
Caroline Haines	Henrika Priest
Jaspreet Hodgson	Alderman Kawsar Zaman

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Ian Thomas
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. **COURT ORDER**

To receive the Order of the Court of Common Council dated 27 April 2023 appointing the Committee and setting its Terms of Reference.

For Information
(Pages 7 - 8)

4. **ELECTION OF CHAIR**

To elect a Chair in accordance with Standing Order No. 29.

For Decision

5. **ELECTION OF DEPUTY CHAIR**

To elect a Deputy Chair in accordance with Standing Order No. 30.

For Decision

6. **MINUTES**

To agree the public minutes and non-public summary of the meeting held on 28 March 2023.

For Decision
(Pages 9 - 14)

7. **OUTSTANDING ACTIONS**

Report of the Town Clerk.

For Decision
(Pages 15 - 16)

8. **APPOINTMENTS TO SUB COMMITTEES AND REPRESENTATIVES TO OUTSIDE BODIES**
Report of the Town Clerk.
For Decision
(Pages 17 - 20)
9. **FOOD LAW ENFORCEMENT PLAN**
Report of the Executive Director, Environment.
For Decision
(Pages 21 - 58)
10. **REDUCTION AND RECYCLING PLAN 2023 - 2025**
Report of the Executive Director, Environment.
For Decision
(Pages 59 - 74)
11. **HIGH-LEVEL BUSINESS PLAN 2023/24 - ENVIRONMENT DEPARTMENT**
Report of the Executive Director, Environment.
For Information
(Pages 75 - 86)
12. **BUSINESS PLANS 2022/23: PROGRESS REPORT (PERIOD 3, DECEMBER 2022 - MARCH 2023)**
Report of the Executive Director, Environment.
For Information
(Pages 87 - 98)
13. **UPDATE ON THE IMPACT OF THE BORDER TARGET OPERATING MODEL ON PORT HEALTH & PUBLIC PROTECTION**
Report of the Executive Director, Environment.
For Information
(Pages 99 - 114)
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 28 March 2023.

For Decision
(Pages 115 - 118)

18. **HEATHROW ANIMAL RECEPTION CENTRE - FORWARD PLAN**

Report of the Executive Director, Environment.

For Information
(Pages 119 - 126)

19. **PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 MARCH 2023**

Report of the Executive Director, Environment.

For Information
(Pages 127 - 136)

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

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

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LYONS, Mayor	RESOLVED: That the Court of Common Council holden in the Guildhall of the City of London on Thursday 27 th April 2023, doth hereby appoint the following Committee until the first meeting of the Court in April, 2024.
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PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

- Constitution**
A Ward Committee consisting of,
 - two Aldermen nominated by the Court of Aldermen
 - up to 31 Commoners representing each Ward (two representatives for the Wards with six or more Members regardless of whether the Ward has sides) or Side of Ward.
- Quorum**
The quorum consists of any nine Members.
- Membership 2023/24**

ALDERMEN

- 3 Prem Goyal, O.B.E.
- 2 Kawsar Zaman

COMMONERS

2	Steve Goodman, O.B.E.....	Aldersgate
3	Helen Lesley Fentimen, O.B.E.....	Aldersgate
2	Mandeep Thandi	Aldgate
2	Luis Felipe Tilleria	Billingsgate
2	Simon D'Olier Duckworth, O.B.E., D.L., Deputy	Bishopsgate
9	Wendy Marilyn Hyde.....	Bishopsgate
2	Dr Giles Robert Evelyn Shilson, Deputy	Bread Street
1	Hugh Selka.....	Bridge and Bridge Without
2	Shahnan Bakth.....	Broad Street
2	Christopher Boden, Deputy.....	Candlewick
7	Mary Durcan	Castle Baynard
2	Glen David Witney.....	Castle Baynard
7	Tijs Broeke.....	Cheap
8	Andrew Stratton McMurtrie J.P.....	Coleman Street
7	Alexander Robertson Martin Barr, Alderman.....	Cordwainer
11	Peter Gerard Dunphy, Deputy.....	Cornhill
2	Natasha Maria Cabrera Lloyd-Owen, Deputy	Cripplegate
2	Elizabeth Anne King, B.E.M	Cripplegate
10	James Henry George Pollard, Deputy.....	Dowgate
4	John Ernest Edwards.....	Farringdon Within
1	John Ross Foley	Farringdon Within
3	George Christopher Abrahams.....	Farringdon Without
2	Oliver Sells K.C.	Farringdon Without
2	Timothy Richard Butcher.....	Langbourn
	(Lime Street has paired with Cornhill for this appointment)	Lime Street
7	Henry Llewellyn Michael Jones, M.B.E.....	Portsoken
2	Caroline Wilma Haines.....	Queenhithe
3	Marianne Bernadette Fredericks, Deputy	Tower

1	Jaspreet Hodgson.....	Vintry
2	Alethea Silk.....	Walbrook

Together with one Member to be appointed this day, in place of the Ward (Bassishaw) not taking up their appointment on this occasion –

Henrika Priest

4. **Terms of Reference**

To be responsible for:-

- (a) all the City of London Corporation's environmental health, port health, animal health, consumer protection, licensing (with the exception of those which are in the province of another Committee), public conveniences, street cleansing, refuse collection and disposal, the street trading enforcement functions in the London Local Authorities Act 1990 including any decision as to whether the s.101 arrangements should be discontinued, and cemetery and crematorium functions;
- (b) the implementation of those sections of any Acts of Parliament and/or European legislation which direct that the local authority take action in respect of those duties listed at (a) above;
- (c) the appointment of the Director of the Built Environment (acting jointly with the Planning & Transportation Committee);
- (d) the appointment of the Director of the Markets and Consumer Protection (acting jointly with the Markets and Licensing Committees);
- (e) the appointment of the Director of Open Spaces (acting jointly with the Natural Environment Board);
- (f) determining any appeals against a decision not to grant City premises a licence under the provisions of the Marriage Act 1994 and the City of London (Approved Premises for Marriage) Act 1996 to conduct civil marriage ceremonies;
- (g) the appointment of the City of London Coroner;
- (h) making recommendations to the Court of Common Council in respect of the making and sealing of byelaws for the variance of charges at the Animal Reception Centre.

PORT HEALTH & ENVIRONMENTAL SERVICES COMMITTEE

Tuesday, 28 March 2023

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

Present

Members:

Deputy Keith Bottomley (Chairman)	Alderman Prem Goyal
Mary Durcan (Deputy Chairman)	Caroline Haines
Shahnan Bakth	Deputy Ann Holmes
Alderman Alexander Barr	Deputy Henry Pollard
Timothy Butcher	Oliver Sells KC
Deputy Peter Dunphy	Glen Witney
John Edwards	

Officers:

Ben Dunleavy	- Town Clerk's Department
Juliemma McLoughlin	- Executive Director, Environment Department
Gary Burks	- Environment Department
Timothy Bage	- Environment Department
Ellen Fouweather	- Town Clerk's Department
Joe Kingston	- Environment Department
Tony Macklin	- Environment Department
Aggie Minas	- Environment Department
Kehinde Haastrup-Olagunju jnr	- Town Clerk's Department
Jenny Pitcairn	- Environment Department
Steve Playle	- Environment Department
Susie Pritchard	- Environment Department
Rachel Pye	- Environment Department
Gavin Stedman	- Environment Department
Maria Traynor	- Environment Department

1. APOLOGIES

Apologies for absence were received from Christopher Boden, Helen Fentiman, Marianne Fredericks, Steve Goodman, Henrika Priest, and Irem Yerdelen.

George Abrahams, Henry Jones, Andrew McMurtrie, Giles Shilson and Jason Pritchard observed the meeting virtually.

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

There were none.

3. **MINUTES**

The public minutes and non-public summary of the meeting held 24 January 2023 were approved as a correct record.

Matters arising

Members noted that officers were still waiting for confirmation from the Department for Environment, Food and Rural Affairs on the details and timeline for the introduction of the Border Target Operating Model; the Committee would receive an update once more information was available.

4. **PUBLIC OUTSTANDING ACTIONS**

Members noted the following items from the Committee's outstanding actions list:

- Correspondence between the Chairman and London Underground had been circulated to Members following a disappointing trial.
- Members had received the presentation regarding income generation and the medium-term Capital Plan. **Closed.**

5. **DRAFT HIGH-LEVEL BUSINESS PLAN 2023/24 - ENVIRONMENT DEPARTMENT**

Members received a report of the Executive Director, Environment, relative to the Environment Department's draft high-level Business Plan 2023/24.

Members discussed the KPIs in the report, noting that it was a top-level strategic plan and that more specific targets would be included in a future report. Officers undertook to return with clarification on whether the projected and actual budget figures were actual revenues.

A Member requested that officers consider the wording in the plan regarding Destination City, hoping to see a more positive focus.

Members praised the Assistant Director of Gardens and Cleansing for his response rate.

Members raised concerns over the data presented in the staff engagement survey, including staff engagement and diversity in the department's workforce. It was noted that the Environment Department was the largest of the City Corporation's department, and the Natural Environment part was still going through the TOM. The figures for the old departmental breakdowns were much stronger. At the request of a Member, officers undertook to provide a breakdown of the Department's senior leadership by ethnic group. The Chairman requested that officers return with a more granular report in the autumn.

RESOLVED, that - Members:

- Note the factors taken into consideration in compiling the Environment Department Business Plan; and

- Approve the elements of the departmental high-level Business Plan which fall within the remit of the Port Health and Environmental Services Committee

6. PROPOSED CHARGES FOR STREET CLEANSING, WASTE COLLECTION AND PUBLIC CONVENIENCES 2023/24

Members received a report of the Executive Director, Environment, relative to proposed charges for services provided by the City Corporation's (the City) Street Cleansing, Waste Collection and Public Conveniences operations.

Officers undertook to provide Members with information on the process for reporting and removing dockless bikes and scooters.

RESOLVED, that - Members approve the charges in the report with effect from 1 April 2023.

7. STREET TRADING FEES 2023/24

Members received a report of the Executive Director, Environment, relative to street trading fees for 2023/24.

RESOLVED, that - Members agree the proposed fees for 2023/24 as set out in the report.

8. IMPROVEMENTS TO METHODOLOGY OF THE CITY OF LONDON THAMES FISHERY RESEARCH EXPERIMENT

Members received a report of the Executive Director, Environment, relative to the Thames Fishery Research Experiment.

The Chairman paid tribute to Reg Butcher.

Some Members expressed their concern that the Research Experiment had moved too far towards being a competition and had lost its scientific overtones. They requested that it be reviewed again after 12 months.

RESOLVED, that – Members:

- Approve the 51st City of London Thames Fishery Research Experiment to proceed in 2023 on the basis that the proposed improvements to angling methodology are implemented and additional external funding is sought.
- Approve the grant of £4,800 from City's Cash to partially fund the 2023 Experiment.

9. RISK MANAGEMENT UPDATE

Members received a report of the Executive Director, Environment, providing an update on risk management.

RESOLVED, that – the report be received and its contents noted.

10. TRADING STANDARDS TEAM UPDATE

Members received a report of the Executive Director, Environment, providing an update on the work of the Trading Standards team.

The following areas were discussed:

- Although food standards and food hygiene are distinct areas of work, they are combined when undertaking interventions.
- There are well-established codes of practice governing how regulatory bodies could employ underage test purchasers, with exhaustive risk assessments and the safety of the young person always being paramount
- There was a small risk of fraud in the City regarding grants for insulation in lower council tax bands, but it was an enormous one nationally. The Trading Standards team be responsible for looking at any potentially fraudulent aspects of work carried out.

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

There were no questions.

12. ANY OTHER BUSINESS THAT THE CHAIRMAN CONSIDERS URGENT

There was no other business.

13. EXCLUSION OF THE PUBLIC

14. NON-PUBLIC MINUTES

The non-public minutes of the meeting held on 24 January 2023 were approved as a correct record.

15. HEATHROW ANIMAL RECEPTION CENTRE - FORWARD PLAN

Members received a report of the Executive Director, Environment, relative to the Heathrow Animal Reception Centre Forward Plan.

16. PORT HEALTH AND ENVIRONMENTAL SERVICES DEBTORS - PERIOD ENDING 31 DECEMBER 2022

Members received a report of the Executive Director, Environment, relative to outstanding debts.

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

There were no questions in the non-public session.

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

There was no urgent business in the non-public session.

The Chairman informed Members that, after serving on the Committee for eight years, and as Chairman for the past three, he would be stepping down entirely

in April. He praised officers for their amazing work, and thanked Members for their diligent and collegiate scrutiny of this work.

The meeting closed at 12.51 pm

Chairman

Contact Officer: Ben Dunleavy
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Port Health & Environmental Services Committee – Outstanding Actions

Item	Date	Action	Officer(s) responsible	To be completed/ progressed to next stage	Progress Update
1. Page 15	15 January 2019	Measurement and mitigation options for operational rail noise from London Underground affecting the Barbican Estate	Executive Director of Environment	Ongoing	<p>Members and officers are meeting with Seb Dance, Deputy Mayor for Transport on the 23rd May to discuss LUL's progress with the promised actions –</p> <ul style="list-style-type: none"> • Report on the modelling of the impacts of speed restrictions after 10pm under Brandon Mews now that the 4LM new signalling system is in place. • Provision of a clearer view of the costs and practicality for moving or removing the points and crossings 35A. <p>An interim response was received on the 8th March and a substantive written update is also expected shortly.</p>

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Agenda Item 8

Committee(s)	Dated:
Port Health and Environmental Services Committee	30 May 2023
Subject: Appointments to Sub Committees and Representatives to Outside Bodies	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	N/A
Does this proposal require extra revenue and/or capital spending?	No
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Town Clerk	For Decision
Report author: Ben Dunleavy, Town Clerk's Department	

Summary

Members are asked to approve the various appointments which the Port Health and Environmental Services Committee makes annually to various other Committees and outside bodies. Further information on these bodies, including the previous appointees for 2022/23, is included at Appendix 1.

Recommendation(s)

That Members:-

- Appoint a Member of this Committee to serve on the Health and Wellbeing Board;
- Appoint a Member of this Committee to serve on the Local Plans Sub-Committee;
- Appoint a Member to serve on the Streets and Walkways Sub-Committee
- Appoint a Member of this Committee to serve as a representative on the Thames Estuary Partnership
- Appoint a Member of this Committee to serve as a trustee on Thames21's Board.

Ben Dunleavy

Town Clerk's Department

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Appendix 1 – Further information on Committee appointments

a) Health & Wellbeing Board

This is a statutory committee which is responsible for all duties of the Health and Social Care Act 2012. It therefore counts as a Grand Committee within the CoL Corporation. It provides collective leadership for advancement of Health and Wellbeing of all people within the CoL by promoting integration of health and social care services. We identify key priorities for health and local government commissioning. Working with Hackney Public Health we prepare a joint needs assessment and a joint health and wellbeing strategy. Covid and its aftermath are particularly important issues for us including vaccination programmes and support for residents and workers regarding their mental health. We have representatives from Healthwatch (always interesting if you are interested in the provision of local health services such as General Practice surgeries), the Police, the health Clinical Commissioning Group, the Hackney Department of Public Health, Community and Children's Services and Port Health and Environmental Services committee. We often have presentations on topical issues (a forthcoming one on dementia). It is an interesting committee meeting every 2 months with relevance to all residential and business wards, their Members and electors and others within the City of London. We would welcome members of Port Health who believe they can contribute to this important work.

2022/23 appointee: Helen Fentimen

b) Local Plans Sub-Committee

This Sub-Committee is sometimes also referred to as the Local Implementation Plan Sub Committee. Its remit is to consider items relating to the Local Development Framework or the Local Implementation Plan that are referred to them for detailed consideration as necessary.

2022/23 appointee: Elizabeth King

c) Streets and Walkways Sub Committee

The Sub Committee is principally concerned with agreeing schemes affecting the function and appearance of the City's highways and walkways. Such schemes would include those associated with the Street Scene Challenge and planning obligations as well as City of London funded initiatives. The Sub Committee also report back, periodically, to the Planning & Transportation Committee on progress in implementing the Committee's plans, policies and strategies relating to streets and walkways.

2022/23 appointee: Oliver Sells

d) Thames Estuary Partnership

The Thames Estuary Partnership (TEP) is a non-profit organisation delivering best practice, knowledge sharing and key connections to achieve a thriving living and working river for London. TEP was created 22 years ago to bring together the leaders of the organisations that are responsible for the sustainability, ecology and commercial activities on the Tidal Thames from Teddington to Shoeburyness. This partnership approach to date has proved incredibly successful; two decades ago, the Thames was in a very poor state of environmental decline, now it is one of the most sustainable estuaries, with a measurable and steady increase in natural habitat population. The partnership has also proved successful as a convener between local

communities, special interest groups and large-scale ports and private developers such as DP World, to find balanced solutions between commercial activity and protecting ecology, mitigating flood risk and providing access.

This position is for the City Corporation representation on the TEP board of directors, and strategic input into the TEP plan going forward. Networking and leadership on behalf of partnership representatives is needed in order for TEP to realistically map out strategic goals and delivery outcomes. The time commitment is typical of a non-executive director. Quarterly board meetings, one or two strategic workshops and on occasion presenting and speaking on behalf of TEP as and when required. The core TEP partners support the organisation through value in kind or funding, or a combination of both.

2022/23 appointee: John Edwards

f) Thames21

Thames21 is the voice for London's waterways, working with communities to improve rivers and canals for people and wildlife. Thames21 mobilises volunteers to clean and green the capital's 400 miles network of waterways. Thames21 aims to transform neglected waterways into areas that everyone can use and enjoy.

Thames21 works hand-in-hand with local communities to improve and maintain our waterways by:

- Engaging people of all ages, abilities and from all parts of society in their local waterways
- Removing litter
- Creating new habitats for wildlife, flora and fauna
- Controlling non-native invasive species
- Introducing reedbeds to tackle pollutants
- Creating sustainable drainage solutions to improve water quality and reduce flood risk
- Promoting safe and equitable access to waterways
- Undertaking monitoring and research into the health of our local rivers
- Deliver environmental education to children and adults
- Campaigning against waterway pollution and promoting sustainable behaviour
- Accrediting and training community groups to deliver safe and sustainable waterway improvement events

2022/23 appointee: Andrew McMurtrie

Committee: 1) Port Health & Environmental Services Committee (For Decision) 2) Health & Wellbeing Board (For Information)	Dated: 1) 30 May 2023 2) 29 June 2023
Subject: Commercial Environmental Health Service Plan 2023-2024	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 6
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Juliemma McLoughlin, Executive Director Environment	1) For Decision 2) For information
Report authors: Gavin, Stedman, Port Health & Public Protection Director Peter Brett, Commercial Environmental Health Team Manager	

Summary

This report seeks approval for the Commercial Environmental Health Service Plan 2023/24 and the Port Health Service Plan 2023/24. The service plans are an important part of the process to ensure that national priorities and standards are addressed and delivered locally.

National Codes of Practice allow local authorities flexibility over how to deliver their regulatory functions for food and occupational health and safety. Service plans set out how and at what level regulatory controls will be provided, in accordance with those Codes of Practice.

This year's Service Plans update Committee on the recovery planning processes laid out over the last two years. It also takes into consideration the Food Standards Agency (FSA) plans for local authorities and the updates they have provided in terms of their modernisation programme.

Recommendation(s)

Members are asked to:-

- a) note the work done to-date; and
- b) approve the Commercial Environmental Health Service Plan 2023-24 at Appendix 1.
- c) approve the Port Health Service Plan 2023/24 at Appendix 2.

Main Report

Background

1. As an enforcement authority the City Corporation has obligations for the delivery of certain food and health and safety controls arising from existing legislation, statutory Codes of Practice and related guidance, and in the Framework agreements that set out requirements for the planning, management and delivery of the requisite local authority enforcement services.
2. To help to ensure local transparency and accountability and to show our contribution to the authority's corporate plan, both FSA and the Health and Safety Executive (HSE) advise that service plans and performance reviews should be approved at the relevant level established for the authority. Our service plans have traditionally been presented to this Committee annually.
3. Realising all the public health and COVID-19 related work that local authority officers were being asked to do, in April 2020, the FSA relinquished the requirement for local authorities to undertake a comprehensive programme of official control inspections in relation to food hygiene and simply required them to carry out certain specific interventions.
4. As a result, in July 2020 we submitted to this Committee a different form of Service Plan, which outlined certain specific priorities and a graduated timetable for return to normality post the pandemic.
5. In November 2020, Members approved a further interim Service Plan for the team taking into account all the additional duties that had been placed upon local authorities. Re-occurring lockdowns caused the team to review this already revamped Service Plan and it was re-presented in a shorter report to this Committee in May 2021.
6. In May 2021, the FSA's Board endorsed a Local Authority Recovery Roadmap strategy or "Recovery programme" covering the period September 2021 to March 2023. The suggested aim was to assist local authorities to tackle any backlogs in their food hygiene inspection programmes as the country began recovering from the pandemic.
7. In November 2021 Member approval was sought for a further revision to the Service Plan that would stretch to March 2023, the same period as the above recovery programme and which set out enforcement work in key areas for food safety and health & safety.
8. The planned food activities set out for the Team are in line with the activities and milestones set out in the recovery programme including the expectation that we moved at a faster pace in realigning with the Code of Practice requirements where we were able.

9. The FSA have continued to set out how they would work with local authorities to bring down the backlogs, starting with those businesses which pose the highest risk. FSA have been assessing progress against agreed milestones using “temperature check” surveys, as well as adapted end of year surveys.
10. The FSA’s Chief Executive recently wrote to local authority leaders, including our Town Clerk to extend her thanks to teams for engaging with the recovery programme, completing the monitoring surveys and verification assessments and for our ongoing vital work in striving to return to pre-pandemic levels of service.
11. The City of London along with all local authorities are required to report on their progress towards the reset programme.

Current Position

Commercial Environmental Health

12. Commercial Environmental Health are still prioritising their work to ensure that City businesses in a variety of sectors operate and remain safe for their customers.
13. We met the significant milestones in the recovery programme to bring interventions at the highest risk businesses back on track and have made significant progress towards returning to the normal inspection frequencies for lower risk businesses too.
14. The FSA have now brought the recovery programme to an end. The expectation is therefore that we will deliver a programme of interventions that aims to meet the full requirements in the existing Food Law Code.
15. In ending the recovery programme the FSA have also confirmed that they will now work with local authorities in a more bespoke way, to help ensure the return to delivery of pre-pandemic levels of service and because further changes are planned in the delivery models for both food hygiene and food standards.
16. We still have a backlog of food hygiene work in lower risk food businesses to work through, alongside a return to the normal performance expectations. There are a minimum number of inspections and interventions that we must deliver. The challenge remains the numbers of ‘D’ rated premises. These are scored ‘lower’ risk but in reality, a significant proportion, though compliant could also be large and/or complex. City hospitality is some of the largest around having traditionally catered for many thousands. We will therefore continue to integrate a proportion of these ‘D’ rated premises into the programme throughout the whole period.
17. In terms of the more detailed programme of other work objectives for the whole team (i.e., not just food safety) this was outlined in our last Plan. But we are also mindful of further significant changes in the delivery of food controls.

18. FSA are working through their Achieving Business Compliance (ABC) Programme to develop these further regulatory reforms; the reforms will affect both food hygiene and food standards delivery. We trust that any such reforms will help us to target available regulatory resources at the areas which pose the greatest risk.
19. This year, FSA expect to begin implementation of a more risk-based, intelligence-driven delivery model for food standards intervention work, which has been developed with, and piloted by, local authorities. FSA will also be working with local authorities to develop the new approach to the delivery of food hygiene in a similar way.
20. We have now therefore refreshed our objectives and set out what we plan to achieve in the coming year, mindful of the above pending changes. The revised Service Plan is at Appendix A. Our plans and objectives may need to be refined as further details of delivery reforms emerge.

Port Health Service

21. The Port Health Service has focussed its attention on undertaking border controls on food and feed that have been imported from countries outside of the EU.
22. In addition, the Service has been preparing for border controls on EU food and feed imports and has responded to the Draft Border Target Operating Model (BTOM); a high-level plan that outlines the new regime for SPS checks on all food, feed and live animals entering the UK. Further details on the BTOM are provided in a separate report for this Committee.
23. Food premises interventions on river vessels and within the Ports and Airport will be done in accordance with the same requirements outlined above for Commercial Environmental Health; there are a smaller number of food businesses that need inspections in the Port Health area. Details can be found in Appendix 2.

Corporate & Strategic Implications

24. Strategic Implications - The Service Plan continues to support two of the main aims of the City Corporation's Corporate Plan 2018 to 2023:
 - ***Contribute to a flourishing society***
1- People are safe and feel safe.
 - ***Support a thriving economy***
6 - We have the world's best legal and regulatory framework and access to global markets.
25. Financial implications - None. The Service Plan will be met from within existing local risk budgets.

26. Resource implications - None.
27. Legal implications - Failure to plan and implement a programme of Official Food Controls interventions could result in sanctions by the FSA, in extremis taking over the operational control of the City Corporation's Food Authority functions.
28. Risk implications - Potential reputational risk to the City Corporation if the above happens.
29. Equalities implications – None following a test of relevance.
30. Climate implications - None.
31. Security implications - None.

Proposals

32. Commercial Environmental Health will continue to undertake the work set out in their Service Plan for 2023-24.
33. The Port Health Service will continue to:
 - a) focus on imported food and feed controls at the border,
 - b) prepare for the implementation of the new border control regime for food and feed; and
 - c) undertake the work set out in their Service Plan for 2023-24.

Conclusions

34. The Service Plans outline a programme of work objectives and how these will be delivered. We will continue to ensure our work is risk-based, supportive to businesses where they are, or seek to be compliant, but providing protection to workers, consumers and the public.
35. At the same time, the City Corporation will continue to meet its obligations to central Government and its agencies as outlined in the various Codes.

Appendices

- Appendix 1 - Commercial Environmental Health Service Plan 2023/24
- Appendix 2 – Port Health Service Plan 2023/24

Background Papers

- Port Health & Environmental Services: July 2020 Agenda Item 14 - [Commercial Environmental Health Team Service Plan 2020-2021](#)

- Port Health & Environmental Services: November 2020 Agenda Item 7 - [Amendments to the Commercial Environmental Health Team Service Plan 2020-2021 with respect to Food Safety](#)
- Port Health & Environmental Services: May 2021 Agenda Item 10 - [Commercial Environmental Health and Port Health Service Plans 2021-2022](#)
- Port Health & Environmental Services: 23 November 2021 Agenda Item 9 [Commercial Environmental Health Service Plan 2021-2023](#)
- Port Health & Environmental Health Services: May 2022 [Commercial Environmental Health Service Plan 2021-2023-revised](#)

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**Environment Department
Port Health & Public Protection Division
Commercial Environmental Health Service Plan 2023-24**

Foreword

This year's Service Plan updates previous Committee reports, it builds on the recovery planning processes laid out over the last two years. It also takes into consideration the Food Standards Agency (FSA) plans for local authorities and the updates they have provided in terms of their modernisation programme.

The FSA Recovery Plans (the Plans) which took effect from 1 July 2021 ran through to April 2023. The Plans focussed on re-starting the regulatory delivery system in line with the Food Law Code of Practice (the Code) for the highest risk establishments, while providing greater flexibility for lower risk establishments.

The Plans set key milestones and we built our food regulatory service delivery around those. FSA have now determined that official food control delivery should be set to meet the full requirements of the Code including the more limited flexibilities still available for lower risk establishments. In considering delivery of appropriate interventions, we also remain mindful of the national changes to the food standards delivery model, expected to be introduced in 2023-24 and planned details on changes to the food hygiene delivery model, details of which are also expected this year. These are part of the overall modernisation programme planned by the FSA. The wider context has changed significantly too, with Government working on a new Borders Target Operating Model (BTOM) and the introduction of the Retained EU Law Bill. Both have placed additional resourcing demands on Government, despite recent announcements regarding further amendments to the latter.

In terms of our more detailed programme of work objectives for the whole Commercial Environmental Health team (i.e. not just food) these are outlined in further detail in this Service Plan. This latest version of the plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

The City of London has now completed the final stages of realigning its services and implementing our target operating model to enable substantial organisational efficiencies.

Gavin Stedman
Port Health & Public Protection Director

May 2023

Introduction

The Commercial Environmental Health Team regulates food safety, occupational health and safety and some public health control arising from commercial businesses' activities for which we are the enforcing authority.

This plan has been prepared to accord with Food Standards Agency (FSA) and Health & Safety Executive (HSE) current frameworks on the planning and delivery of our services. As outlined in the foreword the food framework remains subject of further change as the FSA effects the modernisation programme, known as Achieving Business Compliance (ABC); the Recovery Plans reflect the transitions to new intervention delivery models for both food standards and food hygiene.

The delivery of our overall team goals and guiding principles will consider the various changes in these delivery models; the new food standards model is expected to be introduced this service year and details on the requirements of the food hygiene model are also expected. The current health and safety delivery model is driven by [LAC67-2 \(rev. 12\)](#)

Our plan is also guided by the City Corporation's Corporate Plan 2018-23 and the City & Hackney Joint Strategic Needs Assessment. It will consider the [revised Health and Wellbeing Strategy 2023-27](#) as this develops. Work on our next Corporate Plan (2025-2030) is also currently in development, with a narrative annex for 2024 to be added to the current 2018-23.

The current Corporate Plan outcomes on which we can have a direct impact are...

- Outcome 1: People are safe and feel safe.
- Outcome 2: People enjoy good health and wellbeing.
- Outcome 5: Businesses are trusted and socially and environmentally responsible.
- Outcome 6: We have the world's best legal and regulatory framework and access to global markets.
- Outcome 8: We have access to the skills and talent we need.
- Outcome 11: We have clean air, land and water and a thriving and sustainable natural environment.

Our team goals are that:

- We promote and support a risk based, goal setting regulatory regime.
- Higher risk activities are properly managed, and employers are committed to developing healthier workplaces
- Food is hygienically prepared, safe to eat and what it says it is;

- We regulate in a way that supports businesses to comply and where necessary evolve, whilst not losing sight of the integrity and assurance of safe food for consumers and safe workplaces needing to be at the heart of what we do.

Our guiding principles are:

- working with partners to make workplaces safer and healthier, providing a level playing field for responsible employers, by advising, promoting, and where necessary, enforcing good standards of risk control;
- developing services that contribute to improved management and control of risks, sharing our knowledge;
- continuing our dialogue and conversation with stakeholders to improve the service, always looking to provide simple, pragmatic advice and support;
- using the range of tools at our disposal effectively to influence duty holder behaviour and keep the interests of consumers at the heart of what we do;
- focusing our resources based on risk and using the range of tools at our disposal effectively
- ensuring our workforce is adequately resourced and experienced, enabling the service to fulfil the objectives set in the Department's Business Plan and this local Service Plan.

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Resources, Service Delivery and Recovery- what's changed?

In 2022/23 the new Target Operating Model for the City Corporation was implemented.

We are now in a transition phase for the new intervention delivery models for food. The FSA recognised in a recent [Board Paper](#) that during this period there would be a significant amount of work for LAs and the FSA to undertake in preparation. The FSA originally confirmed that the Recovery Plan priorities would continue to 2023-24 but have more recently indicated a return to full Code of Practice interventions.

We will be introducing a new management information system which goes live in this service plan year. Officers in the team were heavily involved in the transition work that was required in the latter part of 2022-23 but will now be freer to resume 'business as usual' activities. Revisions to food intervention models will however require further (major) changes to our systems to enable operation of the new standards risk matrix and to capture the revised data that will be required for reporting and KPIs, this will then likely be repeated for food hygiene.

We will continue to consider the best way to collect information on the Regulated activities that we need to perform, learning from some of the lessons acquired during the pandemic restrictions to ensure that we have as full a picture as possible.

Decisions about how and where we work are made gradually and deliberately, something we developed during the pandemic. The focus on productivity and effectiveness and a view towards building a more flexible workforce remains.

Performance and monitoring

Our enforcement activity and certain key performance Indicators (KPIs) are reported to the Port Health & Environmental Services Committee along with other planned activities and key highlights, as part of the regular oversight of our work.

The four-monthly Committee reports include;

- The enforcement Activity undertaken for food safety and health and safety intervention work.
- A narrative update on any FHRS '0 rated' establishments.
- Highlighted activities undertaken in the relevant period.
- An FHRS premises profile of all food businesses in the scheme.
- Progress against certain performance indicators.

Service Plan objectives

Our more detailed programme of work objectives for the Team are set out below. This latest plan updates and refreshes the more detailed objectives and sets out what we plan to achieve in the coming year.

Objective	Activities
<p>1. Manage the impacts as the regulatory landscape continues to evolve, including ongoing issues around; EU Transition; the FSA's ABC Programme; and our need to 'make adequate provision' for health and safety enforcement.</p>	<ul style="list-style-type: none"> ▪ Continue to evaluate the impact of proposed new Regulatory regimes. ▪ Continue to explore and develop our strategic networking; lobby and inform relevant stakeholders of the perceived impact of proposed workstreams, the framework programme as a whole and its likely effect on PH&PP and them. ▪ Prepare and align the Commercial EH Team to new regulatory frameworks for the delivery of food and health and safety and where relevant public health, ▪ Strengthen and maintain long-term Member commitment to delivery of our duty as enforcers of workplace health & safety.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <p>Outcome 6: The best legal and regulatory framework- (6b.) we will help promote regulatory confidence and influence UK policy and regulation to protect and grow the economy.</p> <p>The Commercial EH Team continues to be aligned to take advantage of relevant new regulatory frameworks and is structured and designed so that it;</p> <ul style="list-style-type: none"> • is dynamic enough to keep pace with the changes; • can harness new technologies and; • can adapt to future circumstances. <p>Publicly committed to the HSE / Local Authority Statement of Commitment on health & safety regulation and embed the principles within this service plan.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>2. Deliver official food controls.</p> <p>Meet the revised service delivery expectations for LAs. An FSA Board Paper in August 2022 highlighted a number of challenges in Local Authority delivery. Since that time the FSA Recovery Plan has been revised and local authorities are encouraged to return to the interventions and intervals outlined in the Food Law Code of Practice</p> <p>Continue to prioritise planned interventions for high-risk category and non-compliant establishments in specific subordinate objectives and their activities. Lower risk premises will be returned to the programme using the guidance from FSA.</p> <p>To improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action.</p> <p>Manage any transition to the new food standards delivery model and plan similarly for the revised food hygiene model.</p>	<ul style="list-style-type: none"> • Official controls are undertaken where the nature and frequency are prescribed in specific legislation and official controls recommended by FSA guidance are undertaken to support trade and enable export • Reactive work including; enforcement in the case of non-compliance, managing food incidents and food hazards, and investigating and managing complaints • Sampling in accordance with the local authority sampling programme or as required in the context of assessing food business compliance, and any follow-up necessary in relation to the FSA Surveillance Sampling Programme • Ongoing proactive surveillance to obtain an accurate picture of the local business landscape and to; identify open/closed/recently re-opened/new businesses; as well as businesses where there has been a change of operation, activities, or food business operator. • Prioritisation of 'new businesses' for intervention based on risk. • Responding to FHRS requested re-visits in line with the timelines specified in the FHRS Brand Standard for England.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 1: People are safe and feel safe.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible</p> <ul style="list-style-type: none"> ▪ We improve hygiene and standards compliance and reduce risks by focusing activity where non-compliance is identified and by undertaking appropriate follow-up and enforcement action. ▪ Receive and investigate appropriately all requests for service, food incidents and complaints about food and food premises. ▪ Ongoing proactive surveillance to obtain an accurate picture of the business landscape. ▪ New businesses receive an appropriate and timely intervention. ▪ Where required establishments receive an onsite intervention and are thereafter back in the system for interventions in accordance with the Food Law Codes of Practice. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective			Activities
2a: Appropriate food hygiene interventions are completed. New and refreshed food hygiene ratings are given [where possible*].			<ul style="list-style-type: none">▪ The Table in this objective shows all the hygiene inspections due to year end 2023-24. The figures indicated in red in the table in Objective 2d are higher risk premises.▪ All higher risk establishments receive an onsite intervention in accordance with the Food Law Codes of Practice.▪ New premises receive an appropriate intervention within 28 days of registration (or opening). This will be triaged if other higher risk work is required.▪ Lower (rated) risk premises are brought back into the programme and appropriate on-site interventions are completed where this is possible; the focus will be on larger/complex D rated establishments.▪ We will use Alternative Enforcement Strategies and other interventions to gather intelligence/information on all lower risk establishments – this includes those in category D - broadly compliant or better (FHRS 3, 4 or 5) for hygiene, and category B for standards.▪ When intelligence suggests risks have increased (irrespective of the risk category) we will undertake interventions to assess and address those risks The requirements on allergen labelling for products prepacked for direct sale will be considered at appropriate hygiene interventions rather than any separate food standards intervention. [*Where an appropriate inspection/audit intervention has been completed].
Category	Interventions		
	Due to end March 2024	Done 2022-23	
New (unrated)	75	158	
A (*due every 6 months)	8	12	
B (*due every 12 months)	49	83	
C (less than broadly compliant)	15		
C	186	260	
D	648	232	
D (less than broadly compliant)	1		
E	225	44	
Total	1206	789	

Outcome	Responsibility
<ul style="list-style-type: none"> Complete the required risk-based food hygiene interventions: All establishments in Phase 2 of the FSA Recovery Plan receive an onsite intervention per the above timetable Higher risk new premises receive an intervention within 28 days of registration (or opening). Target >90% of other food establishments selected for an intervention are completed. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)

Objective	Activities
2b: Focused follow up activity is conducted in food businesses that are not compliant [in the lower tiers of FHRS (0, 1 & 2)] This is more important than ever as we emerge from the Coronavirus Pandemic, and we look to support the recovery of compliant businesses and protect consumers from non-compliant establishments	<ul style="list-style-type: none"> Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. Use agreed national food safety managements systems such as "Safer Food, Better Business" where these are appropriate. Use on-site inspection reports and mobile working systems. Support the use of ethical business regulation principles. Formal enforcement action will be informed by our current Policy Statement on Enforcement.

Outcome –	Responsibility
<ul style="list-style-type: none"> Action is taken against food businesses that fail to fulfil their obligations. Improving standards in riskier food businesses. Reduction in the number of non-complaint food businesses through improved food hygiene performance and with the confidence this will be sustained. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)

Objective	Activities
2c: Appropriate food standards interventions are completed We are responsible for verifying compliance with food law in the majority of food business establishments. The FSA anticipate that the new food standards model will help better target LA resources towards the highest risks. The new (currently pilot) model is set to ensure that the frequency of food standards controls is based on a better understanding of the level of risk a food business poses.	<ul style="list-style-type: none"> The backbone of our regulatory work remains a targeted (risk-based) intervention program developed in accordance with national requirements. All high-risk premises are rated in accordance with the existing intervention rating scheme in part 5 of the Food Law Code; all others including any overdue inspections are picked up when the next relevant Food Hygiene intervention falls due. Reinforce our intervention strategy with additional follow-ups, including visits, coaching and advice. Formal enforcement action will be informed by our current Policy Statement on Enforcement.

Outcome –	Responsibility
<ul style="list-style-type: none"> Action is taken against food businesses that fail to fulfil their obligations. Improving standards in riskier food businesses. Reduction in the number of non-complaint food businesses through improved food standards performance and with the confidence this will be sustained. 	Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety).

Objective	Activities																								
<p>2d: Maintain support for the national Food Hygiene Rating Scheme (FHRS)</p> <p>We will continue to support FHRS and any development of mandatory display and endeavour to complete interventions that enable an updated rating to be provided; keeping the system relevant for businesses and consumers.</p> <table><tr><th>FHRS Rating</th><th>No premises</th><th>Category, %</th></tr><tr><td>0</td><td>3</td><td rowspan="3">Non-compliant 3.7</td></tr><tr><td>1</td><td>17</td></tr><tr><td>2</td><td>43</td></tr><tr><td>3</td><td>44</td><td>Broadly compliant 2.6</td></tr><tr><td>4</td><td>130</td><td rowspan="2">Good or better 93.7</td></tr><tr><td>5</td><td>1452</td></tr><tr><td>Unrated/outside program</td><td>80</td><td></td></tr><tr><td>Total</td><td>1769</td><td></td></tr></table>	FHRS Rating	No premises	Category, %	0	3	Non-compliant 3.7	1	17	2	43	3	44	Broadly compliant 2.6	4	130	Good or better 93.7	5	1452	Unrated/outside program	80		Total	1769		<ul style="list-style-type: none">It is important for consumer and business confidence that the FHRS system remains credible and objective; the central tenet of the scheme remains a risk-based intervention programme that meets the required FSA standard.Consumers see mandatory display of ratings as a necessary part of any new regulatory model. Our intervention work will therefore endeavour to continue to establish compliance even in lower risk premises.We will therefore consider adaptations to our interventions to ensure lower risk premises remain compliant. This will include interventions that allow formal rating, where this is possible.We will support the re-rating visits according to the process outlined on our website.
FHRS Rating	No premises	Category, %																							
0	3	Non-compliant 3.7																							
1	17																								
2	43																								
3	44	Broadly compliant 2.6																							
4	130	Good or better 93.7																							
5	1452																								
Unrated/outside program	80																								
Total	1769																								
Outcome	Responsibility																								
<ul style="list-style-type: none">Improvements in the number of businesses that meet minimum compliance levels and, in the number, evidencing 'very good' standards of compliance.We deliver the required (risk based) intervention programme outlined in this plan.Food Business Operators want a 5 FHRS rating, they achieve it and then show it by displaying their sticker enabling customers to see that food safety is a top priority and foremost in their minds.	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p>																								

<ul style="list-style-type: none"> The further development of the re-rating scheme is supported in the City as FHRS itself moves towards alignment with the ones in the devolved Governments of Wales and Northern Ireland (where FHRS is mandatory). 	Lead Officers (Food Safety and Health & Safety)
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Objective	Activities
2e: Develop and implement a risk-based food sampling programme	<ul style="list-style-type: none"> Consider our Sampling Policy and local, regional, and national priorities utilising all intelligence available. Take part in relevant regional/national identified studies where we are able. Exchange intelligence and findings on sampling results using relevant local and national intelligence, a key element to a robust system of Official Food Controls. If requested, we will acknowledge and respond to any originating local food authority, in respect of inland referrals, confirming any action taken.
Outcome	Responsibility
<ul style="list-style-type: none"> Delivery of a risk-based sampling programme. This work was drastically scaled back during the pandemic, but the intention is to reinvigorate programmed sampling work in 2023-24 where it supports other workstreams. We comply with the FSA Data Standard for the collection of food and feed sampling intelligence. Contribute to relevant sampling projects selected by UKHSA and the public analyst services. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>3. Ensure adequate arrangements are in place for the enforcement of health and safety.</p> <p>Focus on duty-holder business and activities where risks are highest</p> <p>Section 18(4) of the Health and Safety at Work Act etc. 1974 places a duty on Local Authorities to make 'adequate arrangements for the enforcement' of health and safety and the Code sets out what is meant by 'adequate arrangements for enforcement'.</p> <p>Consider activities in the sectors identified in LAC 67/2 (rev 12); Setting Local Authority Priorities and Targeting Interventions including local intelligence.</p> <p>Subordinate objectives and their activities are outlined in 3a-f below</p>	<ul style="list-style-type: none"> Planned proactive health and safety interventions which focus on national priority topics; Undertaking targeted initiatives based on local intelligence and evidence of risk; Evidence-based education of employers, employees and contractors through guidance and information; Promoting proportionate and sensible health and safety through business engagement and partnership working; Undertaking and participating in health and safety promotion campaigns; Working with and liaising with other internal stakeholders and external organisations Devising material to help businesses comply with the law and promote good practice
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 1: People are safe and feel safe.</p> <p>Outcome 2: People enjoy good health and wellbeing.</p> <p>Outcome 5: Businesses are trusted and socially and environmentally responsible.</p> <ul style="list-style-type: none"> Planned interventions are evidence based. Proactive inspection are only used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 12), or where there is local intelligence of failure to manage risk or for making it a specific local priority.. All reactive and proactive work is underpinned by local, regional, and national liaison. An appropriate mechanism for ensuring consistency between enforcers, for sharing good practice, for sharing information and for informing other enforcers of potential difficult situations 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>3a; Management of legionella in cooling towers.</p> <p>A Local Priority and Targeting Interventions including local intelligence. The risk of a Legionnaires' disease outbreak affecting the Square Mile is considered an unacceptable public health and reputational risk, especially when compared with any perceived burden from our intervention activity.</p> <p>One hundred and twenty sites are due an intervention in the period to end March 2024. Fifty-two are in the higher risk categories and will receive an on-site intervention</p>	<ul style="list-style-type: none"> ▪ Proactive interventions are considered necessary based on local intelligence and following the considerable upheaval of the pandemic and potential impact on the management of legionella, e.g. building occupancy and use during various Lockdown iterations ▪ Risk-based interventions at sites with cooling towers; revisits and enforcement action taken as necessary; ▪ Review status of decommissioned tower sites and follow up accordingly. ▪ Engagement with duty holders at new / proposed cooling tower sites: Advice to Principal Designers and Designers including at the pre-application or Planning Application stage of development. ▪ Focus attention on sites that have:- <ul style="list-style-type: none"> ○ not yet demonstrated the ability to manage their Legionella risk in a sustained manner, and includes new cooling towers / evaporative condensers; and/or ○ relevant enforcement action in the last 5 years and have not yet demonstrated sustained control of Legionella risk. ▪ Legionella Control Association attend quarterly meetings ▪ Deliver training for inspectors on legionella and cooling towers (in conjunction with ALEHM and wider). ▪ Host / support further professional development events for the regulatory and public health community.
Outcome –	Responsibility
<p>Planned interventions are evidence based for cooling tower systems. Proactive inspections are a reliable means of intelligence gathering. This type of intervention remains broadly supported by duty-holders who value our input and oversight</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities	
3b; Electrical safety in hospitality settings. The Electricity at Work Regulation 1989 requires that any electrical equipment which has the potential to cause injury is maintained in a safe condition	<ul style="list-style-type: none"> Consider matters of evident concern and raise at on site food hygiene interventions. 	
Outcome –		Responsibility
Planned interventions are evidence based. Proactive inspection are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 12) , or where there is local intelligence of failure to manage risk.		Assistant Director (Regulation and Compliance) Commercial EH Team Manager Lead Officers (Food Safety and Health & Safety)

Objective	Activities	
3c: Gas safety in commercial catering premises. The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas.	<ul style="list-style-type: none"> Gas safety in commercial catering premises. The proper installation, maintenance and inspection by a competent Gas Safe registered engineer is essential to ensuring that staff and customers at commercial catering premises are protected from exposure to carbon monoxide gas. Continue to survey food premises likely to be using solid fuel appliances (at the time they become due for an on-site food hygiene inspection). Follow-up enforcement in premises where there are matters of evident concern 	
Outcome		Responsibility
Planned interventions are evidence based. Proactive inspections are only be used for the activities in the sectors contained in the list of priority topic areas which is embodied in the National Code and LAC 67/2 (rev 12) , or where there is local intelligence of failure to manage risk.		Assistant Director (Commercial Services) Commercial EH Team Manager

	Lead Officers (Food Safety and Health & Safety)
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Objective	Activities
<p>3d: Crowd management & injuries/fatalities to the public</p> <p>Event Safety / Crowd control at large scale public gatherings/ events remains a National Priority for 2023-24.</p> <p>The City Corporation host many high-profile events, and the City are also the enforcement authority for some of the larger higher risk events.</p>	<ul style="list-style-type: none"> Work with Licensing, Operational and Safety Planning Groups to better understand proposed event plans Work as part of the City Corporation's Safety Advisory Group (SAG) to advise on and help promote risk management and good practice with event organisers. Visits to events to verify the application of appropriate risk control measures. Where necessary intelligence is shared between appropriate stakeholders, e.g. City of London Police, London Fire, London Ambulance, City Corporation's Highways service.
Outcome	Responsibility
Lack of suitable planning, management and monitoring of the risks arising from crowd movement and behaviour as they arrive, leave, and move around a venue is addressed where this is necessary.	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>3e: All London Borough Health & Safety Liaison Group (ALBHSLG)</p> <p>Under LAC67/2 LAs should consider whether they can gain regulatory efficiencies by planning activity collectively e.g. with members of their local LA liaison groups.</p>	<ul style="list-style-type: none"> Any planned activity programme formulated by ALBHSLG for 2023-24 will be considered and resourced appropriately. Work with relevant signatories of the Work-related deaths protocol to clarify and set demarcation arrangements and promote cooperation.
Outcome	Responsibility

<ul style="list-style-type: none"> Work with a potential range of agencies to develop partnership approaches that improve compliance and help duty-holders to manage health and safety. <p>Note: Planned project activity was paused following Coronavirus measures</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>
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Objective	Activities	
3f: Reactive health and safety interventions	<ul style="list-style-type: none"> Investigating reported accidents, occupational diseases and dangerous occurrences that meet the appropriate criteria for follow up; Responding to complaints and requests for service; Permissioning work; <ul style="list-style-type: none"> In MST premises (in liaison with Licensing colleagues); Asbestos notifications; and, Thorough examination (usually lift) reports; Responding to consultations, e.g. from Licensing; Providing or signposting advice and information to duty holders; Prioritised and targeted health and safety promotional campaigns. 	
Outcome – Corporate Plan objectives are in bold		Responsibility
<ul style="list-style-type: none"> Incidents / Accidents: a decision to investigate is made in accordance with the appropriate Incident Selection Criteria Guidance LAC 22/13¹ Initial enquiries are completed to national guidelines: establishing or verifying key facts and further information to inform a decision on whether to investigate further and to what extent. Investigation and any follow-up enforcement action is taken in accordance with the HSE guidelines including the Enforcement Management Model (EMM) 		<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

¹ Health & Safety Executive and Local Authorities Enforcement Liaison Committee (HELA) Incident Selection Criteria www.hse.gov.uk/lau/lacs/22-13

Objective	Activities
<p>4. Help promote and support the growth and successful delivery of workplace health and wellbeing in City businesses.</p> <p>Using:</p> <ol style="list-style-type: none"> Promotion of the London Healthy Workplace Charter (external link) a good practice framework aimed at improving the health and well-being of employees. Awareness raising of the work-related stress and mental health campaign 'Working Minds' this launched in November 2021 and is still running. The Healthier Catering Commitment (HCC), a voluntary scheme promoted by local authorities to help caterers and food businesses make simple, healthy improvements to their food. We spent time developing an enhanced HCC scheme for food businesses in the City of London and launched the scheme in 2019-20. Where appropriate we will align this work with the evolving public health agenda (including regulation) on food. 	<ul style="list-style-type: none"> Encourage sign up to the community Business Healthy network. Encourage development and use of the good practice framework for the workplace charter. Raise awareness of the work-related stress and mental health campaign. Signpost the 'Working Minds' campaign which is relevant to all businesses but is aimed particularly at SMEs and is encouraging employers and employees to use the five 'R' approach to: <ul style="list-style-type: none"> make stress and mental health ROUTINE, as part of employee engagement REACH out to their colleagues, RECOGNISE the signs of stress, RESPOND to reduce the risk, REFLECT on how these experiences can be used to improve the workplace We still need to reinvigorate the HCC scheme and develop and promote the initiative anew in relevant food establishments. Maintain and enhance our links with the pan London development of HCC.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 2: People enjoy good health and wellbeing</p> <p>In October 2018, the City Corporation formally pledged to tackle obesity and promote healthier choices by signing the Local Government Declaration on Sugar Reduction and Healthier Food. Evidence suggests a healthy workforce can reduce sickness absence, lower staff turnover and boost productivity -good for employers, workers, and the wider economy.</p> <p>More food businesses are signed up to the HCC Award.</p> <p>Engagement with and buy in from, potential businesses using referral mechanisms, existing networks, and resources such as Public Protection Team Business Healthy initiative. Work is part of the City & Hackney's Joint Health and Wellbeing Strategy, including mental health and is supported by the 'Business Healthy' initiative.</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
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<p>5. Develop Primary Authority Partnership work</p> <p>Primary Authority enables businesses to form a legal partnership with one local authority, which then provides assured and tailored advice on complying with environmental health, trading standards and other regulations that local regulators must respect.</p> <p>The Regulatory Enforcement and Sanctions Act 2008, as amended by the Enterprise Act 2016 established Primary Authority as a statutory scheme.</p>	<ul style="list-style-type: none"> ▪ Pursue our on-going Primary Authority Partnership (PAP) work, where benefits remain for the partnership. ▪ Consider further PAPs where this is likely to be a good fit and we have the capacity and resource to help make the difference. ▪ The enhanced development of our Primary Authority offering has not yet been pursued but we remain active in the development of individual partnerships and with the development of regional and sector specific national PA groups.
<p>Outcome – Corporate Plan objectives are in bold</p> <p>Outcome 6 (6a): we will promote regulatory confidence founded on the rule of law.</p> <p>Outcome 8: We have access to the skills and talent we need.</p> <p>Outcome 9: We are digitally and physically well connected and responsive.</p> <p>Outcome 10: We inspire enterprise, excellence, creativity, and collaboration.</p> <ul style="list-style-type: none"> ▪ Improved support for businesses and economic growth to enable them to better manage their key health, safety, and food related risks. ▪ Ensuring progress towards the Government's better regulation agenda, providing streamlined and improved regulation. ▪ Increased Primary Authority work. With Increased income and enhanced reputation for the City of London. ▪ Improved working with national and other regulators on the provision of specific advice. ▪ Businesses that sign up to a Primary Authority partnership have access to reliable, timely and tailored regulatory advice. 	<p>Responsibility</p> <p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>6. Further develop the Commercial EH Team in line with the agreed objectives.</p> <p>Focus on our people and work in collaboration with others. Produce training and development opportunities for peers.</p>	<ul style="list-style-type: none"> ▪ Continue to develop and enhance the competency of our frontline professionals. ▪ Further develop our succession and workforce plan and embed the Corporate mechanisms designed to support this process. ▪ Develop further (suitable) training arrangements; job shadowing; mentoring and coaching; using the revised performance development approach in our Corporate appraisal process. ▪ Specific training will be developed in line with the FSA and HSE competency frameworks. ▪ Further develop agreed meat hygiene training for London authorities in association with peer organisations, allied universities and food professionals utilising Smithfield Market. ▪ Further develop health & safety training for peers ▪ Continue to improve officers' awareness and understanding of business' needs, how to effectively communicate messages using a broad range of intervention strategies to influence the behaviour of organisations. ▪ Continue to support apprentices and graduates.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 8: We have access to the skills and talent we need. Outcome 9: We are digitally and physically well-connected and responsive. Outcome 10: We inspire enterprise, excellence, creativity, and collaboration</p> <ul style="list-style-type: none"> ▪ Our workforce is adequately resourced and experienced, enabling the service to fulfil its key objectives. ▪ We have a more efficient service and improved staff morale, resulting in a better service for our customers. ▪ We are, and we remain an excellent, modern, and accountable regulator focused on delivering a better service for our customers. ▪ Our workforce will be well led and experienced, enabling the service to fulfil the objectives set now and for the foreseeable future. 	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p>

Objective	Activities
<p>7. Further develop IT and information management systems and capabilities and improve our online service offer. Build on lessons learned during the pandemic</p> <p>The new Environment Department moves to the IDOX Uniform back-office system in late April 2023, replacing NEC M3 / Assure</p>	<ul style="list-style-type: none"> ▪ The project to replace the two current back-office systems with one shared Uniform system is scheduled for completion in mid-2023. ▪ We will continue to work collectively with the relevant Module Administrators/ Key People in order to embed and develop Uniform so that it matches the desired business processes of the team. ▪ Work to further improve our digital customer services streamlining both internal and external processes to everyone's advantage*.
Outcome – Corporate Plan objectives are in bold	Responsibility
<p>Outcome 9: We are digitally and physically well-connected and responsive.</p> <ul style="list-style-type: none"> ▪ Faster data and information capture, improved intelligence and targeting enforcement, more effective communication with businesses. ▪ The existing Service delivers a streamlined, accessible format with a clear focus on customer requirements ▪ The shared Uniform system will enable officers in different Divisions and their teams to share data more effectively and be sighted on the activities of the wider Department. ▪ Reduce the administrative and reporting burdens that we place on our front line, professionals, while improving for the longer term the information and intelligence we gather to aid our operational planning. We will be better able to identify poor performing businesses and sectors. ▪ More 'open data' provision is considered. <p>*Activities still to include: Further Corporate website development; Online forms (inc. payments); use of the FSA food registration system; data gathering and development of data analytics (inc. the FSA work on performance management and segmentation); development of the Departments management information system (database)</p>	<p>Assistant Director (Regulation and Compliance)</p> <p>Commercial EH Team Manager</p> <p>Lead Officers (Food Safety and Health & Safety)</p> <p>Module Administrators (for the shared Uniform system)</p>

Appendix 2 – Port Health Food Safety Enforcement Plan 23/24

Food Safety Enforcement Plan 2023/24 – Port Health

Service Aims and Objectives

Through this plan, the London Port Health Authority (LPHA) aims to:-

- Ensure compliance with legislation related to imported food and animal feed to protect food safety and animal health
- Deliver a high quality, accessible and responsive service to protect, enhance, and improve public, environmental, and animal health throughout the London Port Health district

This Plan aims to ensure that our enforcement remains targeted, proportionate, consistent and transparent, and sets out the framework for its delivery. It has been prepared as required by the Food Standards Agency (FSA) and the content of this Plan provides the basis upon which the LPHA will be monitored and audited by the FSA.

The LPHA also has responsibility for Animal Feeding Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Food Hygiene and Food Standards Inspections

The Port Health Service undertakes food hygiene and food standards inspections of premises within the Port domain, including Approved premises. The Port is also responsible for the inspection of some fixed craft and moving vessels serving food and drink on the tidal Thames. Food premises airside at London City Airport also come under the Port. LPHA currently regulates 141 food businesses, of which 7 are non-compliant at the start of 23/24.

The number of Food Hygiene/Food Standards inspections undertaken in 2022/23 were 51 for Food Hygiene (including Alternative Enforcement Strategy) and 8 Food Standards. LPHA has followed the Food Standards Agency Recovery plan (following the Pandemic) but 23/24 will be a normal year in terms of food hygiene and standards inspection delivery.

The City has also entered into a Local Government (Miscellaneous Provisions) Act section 101 agreement with Thurrock Council to exercise Thurrock's functions under the feed and food laws in a section of the Logistics Park which has resulted in another area of responsibility for LPHA.

Alternative Enforcement Strategy

The LPHA has also exercised the advice in the Food Law Code of Practice (COP) which allows for an alternative enforcement strategy (AES) for low-risk premises, i.e. Food Hygiene category E based on the COP risk rating.

All new registrations will have an initial formal inspection and if rated as an E they will then come under the AES. Under the AES the premises will be due an intervention every 3 years and the intention is that a physical inspection will be carried out every 9 years.

Premises and vessels under the AES will receive a specific questionnaire which will be scrutinised by a competent officer to assess if enough information has been obtained. A follow up telephone call may be necessary. Some premises will receive a follow up visit to verify information on the questionnaire and visits, if necessary, will take place following complaints, ID notifications, changes of activity/management or non-return of questionnaire.

It is the intention that the larger E rated premises within the Port, which have comprehensive HACCP documentation, such as large-scale storage facilities and milling plants will still have a visit at each due intervention.

Feed and Food Complaints

The Service follows corporate policy in relation to any complaints and we aim to provide a same day response to all consumer complaints on food matters.

Home Authority Principle and Primary Authority Scheme

It is our policy to contact the Primary Authority when we become aware of an importer not conforming with the relevant import regulations. We also try to identify and contact Primary Authorities following adverse sample results.

The Primary Authority database is always examined to check for any partnerships in relation to any food premises that face interventions.

We also provide updates on current issues and offer advice and support in the use of electronic systems such as the IPAFFS system.

Business Recovery Plan

Due to the enforced closure of some food businesses under The Health Protection (Coronavirus, Business Closure) (England) Regulations 2020 and the time that this was in place some of our businesses inspected under the LPHA have required some assistance in order to get back up and running. This assistance has been in relation to re- opening and the action needed to be taken prior to this, advice on waste disposal, sanitisation, pest control, legionella controls due to stagnant water, training for staff. A pragmatic approach has been taken in order to assist these businesses, this is in line with the approach taken by colleagues within the Square Mile.

The service continues to:

- a) focus on imported food and feed controls at the border,
- b) prepare for the announcement of EU border controls later this year,
- c) continue to support business recover from COVID related issues

Food and Feed Sampling

All samples in respect of Imported Food are taken in accordance with Port Health's Sampling Policy. Details regarding the selection, procurement and preparation of samples are contained in the Service's Sampling Plan.

The main aim of our sampling programme is to proactively detect foods outside specific regulation which may be a threat to public or animal health. In addition, we monitor and sample on a risk basis having regard to information from a range of sources including Border Notifications, FSA / Defra intelligence, previous adverse sample results, new products and random sampling.

POAO is checked at the frequencies set by the European Commission and as we follow the Border Operating Model (detailing the timeline for import controls) these will become GB led frequencies.

Sampling plans will change throughout the year to reflect emerging issues and evidence. Further details can be found in the Port Health Sampling Plans in Appendix 1 and 2.

In 2022/2023 the service took:

337 POAO samples (excluding Brazil) and 936 NAO consignments of food and feed were sampled for chemical and bacteriological contamination; and received:

9 POAO unsatisfactory results have been received. 45 NAO unsatisfactory results for chemical, biological and labelling issues.

This has resulted in further formal action, including detention and/or destruction of the consignment, for adverse chemical and biological results. Labelling issues are referred to the responsible Trading Standards service at consignment's destination.

Since 30 March 2017, the EU Commission implemented enhanced checks on consignments of meat and meat derived products from Brazil resulting in all consignments being subject to physical examination with 20% of the consignments being also subject to sampling for microbiological standards. This level of enhanced checks was in response to fraudulent activities in Brazil and continue in force at present. This has amounted to 773 samples taken in 22/23.

Selection of Consignments

The requirement and selection of a consignment for routine sampling is decided officers either during the documentary check process or at the time of the physical examination of the product. Officers can subject any consignment at any stage of the checks to any sampling and laboratory tests if it is considered necessary to ascertain that the consignment meets the import requirements. Officers are either a qualified Chartered/Environmental Health Practitioner or Official Veterinarian.

Information that can be used to help identify and prioritise risks includes:

1. Intelligence obtained from different national and international databases: IPAFFS, RASFF
2. Specific priorities and alerts issued by the different Regulators.
3. Local intelligence/professional expertise from results from previous years and type of imports.

The information sources listed above can be used to assess risks. The risk assessment is likely to be a combination of data, judgement and expert knowledge.

The plan specifies the types of products, origin of the products (if relevant) and the analysis or exam required. The sampling plan aims to proactively detect food or feed which may be a danger to public or animal health and to ensure compliance with food standards and relevant legislation. The sampling plan covers food and feed of POAO or NAO. The plan is not fixed, but is reviewed at regular intervals during the year, to adjust it to the fluctuations in trade and the on-going assessment of the existent and emerging risks.

Officers will undertake sampling in accordance with the standards required in the various Codes of Practice, and in compliance with any methodology when specified in the Regulations:

New products should be sampled if possible or where the AO suspects the consignment does not comply with the import conditions.

Feed, Food Safety and Standards promotional work, and other non-official controls interventions

Regular stakeholder events are held to update the trade and discuss current issues. This opportunity is taken to promote the use of Information Technology to speed clearance times.

Products of Animal Origin and Non-Animal Origin (Food & Feed) - Sampling Plan 23/24

The purpose of the plan is to specify the imported Products of Animal Origin (POAO) and Non-Animal Origin (NAO) food/feed that should be sampled for examination and analysis each year. The plan also includes locally sourced samples of shellfish from the Thames Estuary. The plan is devised using a risk-based approach when deciding which tests and products to be sampled, balanced with the requirement of randomisation in the selection of consignments.

The LPHA Imported Food Sampling Policy allows sampling of food and feed to be decided on a local basis according to product type, local knowledge, seasonal variation and historical import records at each individual port. Deviations from the sampling protocol are permitted to take account of an importer's history of non-compliance with legislative requirements, previous adverse sample results and intelligence received, for example, from inland local authorities, importers and consumer complaints.

2023/24 Sampling Plans

NAO Sampling

See Annex A for the plan for NAO food and feed samples being taken this year.

POAO Sampling

See Annex B for the plan for fishery products and POAO food and feed samples being taken this year.

FSA Food Sampling Survey

There is an additional FSA Food Sampling Survey to be carried out for this period, where funding is obtained directly from Central Government. The purpose of this survey is to supplement Local Government food sampling with specific priorities, so foods of national concern can be tested.

Laboratories used by Port Health are listed below:

1. Food Water and Environmental Microbiology Laboratory London 61 Colindale Avenue, London, NW9 5EQ
Telephone: 02083276550
Email: FWEM@ukhsa.gov.uk
2. Kent Scientific Services
8 Abbey Wood Road, Kings Hill, West Malling, Kent ME19 4YT Telephone 030004151000
Email : kss@kent.gov.uk
3. Public Analyst Scientific Services (Eurofins UK)
i54 Business Park, Valiant Way, Wolverhampton. WV9 5GB
Telephone 01902627200
Email: info@publicanalystservices.co.uk
4. Centre for Environment, Fisheries and Aquaculture Science (CEFAS) Pakefield Road, Lowestoft, Suffolk, NR33 0HT
Telephone 01502562244
Email : www.cefasc.co.uk/contact-us

Results

When the results are received, they are entered in the City's database Port Health Interactive Live System (PHILIS) and UK databases, where appropriate.

For unsatisfactory results, officers will instigate further action which includes:

1. Notifying the food/feed business operator of the failure and issue the appropriate notifications to reject the consignment if still not released for import (for instance in the case of suspicious consignments). The possible options will be destruction or re-export, depending on the assessment of the risk posed by the failure.

2. Notifying the Local Authority of the premises of destination when the consignment was released pending the results, to allow them to take appropriate action for the non-compliant product in circulation.
3. Depending on the failure IPAFFS might trigger the issuing of an emergency notifications.

Feed and Food Safety Incidents

LPHA are committed to responding promptly to all food or feed safety incidents. The Service has arrangements in place to ensure that it is able to respond to Food Alerts issued by the FSA. Warnings are received electronically, and all urgent Food Alerts receive immediate attention and action where necessary. Out of hours arrangements are in place.

Border Notifications issued by the European Commission are sent to a designated Officer who is responsible for their distribution amongst LPHA Officers involved in Imported Food Enforcement. LPHA's database, Port Health Interactive Live Information System (PHILIS) can be used to issue reminders when specific products are subject to control.

Organisational Structure

The service is staffed by:

- 1 Assistant Director
- 5 Managers
- 3 Team Leaders
- 12 Port Health Officers
- 10 Official Veterinarians
- 15 Port Health Technical Officers (PHTOs)
- 10 Support Assistants
- 6 Launch Crew
- 1 Apprentice
- 56 staff in total at start of 23/24 financial year
- 8 additional staff continue to be funded by Central Government in 23/24

□

Annex A:

Proposed Imported FNAO NMP – sampling priorities table for 23/24 for food not of animal origin

	High priority
	Medium priority
	Low priority

[Text Wrapping Break]

Nuts & seeds products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Nuts & seeds products	<i>E. coli</i> , <i>Salmonella</i> , <i>Listeria monocytogenes</i>	Potentially ready-to-eat commodities: fresh coconut, nut spreads, sesame seeds, cumin seeds; alfalfa sprouts, all bean sprouts, other sprouted seeds, tahini & halva (from Syria)
High	Nuts & seeds products	<i>Aflatoxins</i>	Almonds (including ground/flour), groundnuts (including spreads/flour), Brazil nuts, pistachios, hazelnuts, walnuts, other tree nuts and mixed nuts, nut spreads and butters, melon seeds (egusi), chia seeds
Medium	Nuts & seeds products	<i>Cyanide (hydrocyanic acid)</i>	Apricot kernels, bitter almonds
Medium	Nuts & seeds products	<i>Undeclared allergens</i>	Nut spreads and butters
Medium	Nuts & seeds products	<i>Pesticide residues</i>	Bean sprouts (mung beans)
Low	Nuts & seeds products	<i>Undeclared sulphites</i>	Coconut (desiccated, dried, flour)

Herbs & spices

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Herbs & spices	<i>Salmonella</i> , <i>Shiga toxin producing E. coli (STEC)</i> , <i>Listeria monocytogenes</i>	Potentially ready-to-eat commodities: paan (betel) leaves, coriander leaves and other herbs (fresh or dried); pepper (black, pink & white), paprika powder, chilli powder, spice mixtures

High	Herbs & spices	<i>Aflatoxins</i>	Nutmeg (whole & ground), paprika, chilli powder
High	Herbs & spices	<i>Sudan dyes</i>	Turmeric (from Bangladesh), crushed pepper (from China), paprika (from Russia), spices and sumac (from Turkey)
Medium	Herbs & spices	Undeclared allergens, colours/dyes or sulphites	Spice mixtures, curry powder
Medium	Herbs & spices	<i>Pyrrolizidine alkaloids (PAHs)</i>	Cumin, oregano (from a number of countries)
Medium	Herbs & spices	<i>Pesticide residues</i>	Tea leaves (especially from India); ginger, coriander roots & leaves, paprika, chilli powder; herbs (from Israel and Cambodia)
Low	Herbs & spices	<i>Benzo(a)pyrene (BaP)</i>	Ginger, oregano

Fruit & vegetables

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Fruit & vegetables	<i>Salmonella, Shiga toxin producing E. coli (STEC), Listeria monocytogenes</i>	Potentially ready-to-eat commodities: e.g. peppers (sweet or bell), salad leaves, prepared fresh vegetables, enoki mushrooms (especially from China)
High	Fruit & vegetables	<i>Aflatoxins</i>	Dried figs, chilli peppers (fresh or dried)
Medium	Fruit & vegetables	<i>Pesticide residues</i>	Dried beans (from any non-EU country), beans (fresh), yardlong beans, okra, peppers (sweet or bell), chilli peppers (fresh or dried), spinach, vine leaves (from Egypt). Vine fruits/raisins, pomegranates, citrus fruits, mangoes (fresh or dried), prepared fresh fruit, dried dates, bananas (from Ecuador), apples (from India)
Medium	Fruit & vegetables	<i>Norovirus / Hepatitis A</i>	Frozen sweetcorn, frozen raspberries, other small fruit & berries
Low	Fruit & vegetables	<i>Ochratoxin A</i>	Vine fruits/raisins, dried figs

Low	Fruit & vegetables	<i>Cadmium</i>	Avocados & asparagus (from Peru)
Low	Fruit & vegetables	<i>Undeclared sulphites</i>	Dried apricots, dried dates, other dried or candied/mixed fruits
Low	Fruit & vegetables	<i>Iodine</i>	Seaweed and kelp (from China, Japan & Korea)

Other FNAO products

Priority Ranking	Product Category	Hazard	Specific sampling guidance
High	Edible oils	<i>Sudan dyes</i>	Palm oil (from Ivory Coast)
High	Grain products	<i>Sudan dyes</i>	Couscous (from Lebanon), fruit bars (from USA)
Medium	Edible oils	<i>3-MPCD & Pyrrolizidine alkaloids (PAHs)</i>	Palm oil
Medium	Grain products	<i>Pesticide residues</i>	Rice (from India)
Low	Grain products	<i>Ethylene oxide</i>	Noodles (from Vietnam)
Low	Food supplements	<i>Ethylene oxide</i>	Various food supplements (from India)

Annex B:

Imported POAO NMP 23/24

BCP	Type	Sample	Samples
London Gateway	Honey	LPHA - Honey - Antibacterials and Pesticides	4
London Gateway	Honey	LPHA - Honey - Authenticity	2
London Gateway	Casings	LPHA - Meat & Products for Anthelmintics	1
London Gateway	Casings	LPHA - Animal Casings - Antibacterials	1
London Gateway	Casings	LPHA - Meat for Residues	1
London Gateway	Dairy	LPHA - Milk Products - Fungal moulds and yeasts	1
London Gateway	Dairy	LPHA - Milk Products - lead and cadmium	1
London Gateway	Dairy	LPHA - Milk products - Microbiological	3
London Gateway	Bovine	LPHA - Fresh and Poultry Meats - dioxin and PCB	1
London Gateway	Bovine	LPHA - Fresh and Poultry Meats - lead and cadmium	1
London Gateway	Bovine	LPHA - Hormonal growth promoters	2
London Gateway	Bovine	LPHA - Meat & Products for Anthelmintics	11
London Gateway	Bovine	LPHA - Meat for E. Coli STEC	3
London Gateway	Bovine	LPHA - Canned products - tin	4
London Gateway	Bovine	LPHA - Flame Grilled Products - PAH	1
London Gateway	Ovine	LPHA - Fresh and Poultry Meats - dioxin and PCB	1
London Gateway	Ovine	LPHA - Fresh and Poultry Meats - lead and cadmium	1
London Gateway	Ovine	LPHA - Meat and Preparations - Salmonella and E. coli	3
London Gateway	Ovine	LPHA - Meat for Residues	4
London Gateway	Porcine	LPHA - Fresh and Poultry Meats - dioxin and PCB	1
London Gateway	Porcine	LPHA - Fresh and Poultry Meats - lead and cadmium	1
London Gateway	Porcine	LPHA - Meat for Residues	2
London Gateway	Porcine	LPHA - Flame Grilled Products - PAH	1
London Gateway	Poultry	LPHA - Fresh and Poultry Meats - dioxin and PCB	1
London Gateway	Poultry	LPHA - Fresh and Poultry Meats - lead and cadmium	2
London Gateway	Poultry	LPHA - Poultry for Residues	20
London Gateway	Poultry	LPHA - Raw Poultry - Carbapenemase, AmpC, ESBL	8
London Gateway	Poultry	LPHA - Raw Poultry AMR	8
London Gateway	Poultry	LPHA - Meat and Preparations - Micro	8
London Gateway	Poultry	LPHA - Cooked Poultry AMR	8
London Gateway	Poultry	LPHA - Meat Products - Micro	4
London Gateway	Gelatine/Collagen	LPHA - Gelatine / Collagen - Residues 853/2004	4
London Gateway	Gelatine/Collagen	LPHA - Gelatine / Collagen - Salmonella	1

	Petfood/Dog		
London Gateway	Chews	LPHA - Dog chews / petfood - microbiological	6
	Petfood/Dog	LPHA - Dog chews / petfood - Veterinary	
London Gateway	Chews	Residues	1
London Gateway	Ready to Eat	LPHA - POAO Ready to Eat	2
Tilbury	Honey	LPHA - Honey - Antibacterials and Pesticides	2
Tilbury	Honey	LPHA - Honey - Authenticity	1
		LPHA - Milk Products - Fungal moulds and yeasts	
Tilbury	Dairy		1
Tilbury	Dairy	LPHA - Milk Products - lead and cadmium	1
Tilbury	Dairy	LPHA - Milk products - Microbiological	4
		LPHA - Fresh and Poultry Meats - dioxin and PCB	
Tilbury	Bovine		1
		LPHA - Fresh and Poultry Meats - lead and cadmium	
Tilbury	Bovine		1
Tilbury	Bovine	LPHA - Meat & Products for Anthelmintics	1
Tilbury	Bovine	LPHA - Meat for E. Coli STEC	2
		LPHA - Fresh and Poultry Meats - dioxin and PCB	
Tilbury	Ovine		1
		LPHA - Fresh and Poultry Meats - lead and cadmium	
Tilbury	Ovine		1
		LPHA - Meat and Preparations - Salmonella -E coli	
Tilbury	Ovine		2
Tilbury	Ovine	LPHA - Meat for Residues	2
Tilbury	Poultry	LPHA - Meat and Preparations - Micro	1
	Petfood/Dog		
Tilbury	Chews	LPHA - Dog chews / petfood - microbiological	2
	Petfood/Dog	LPHA - Dog chews / petfood - Veterinary	
Tilbury	Chews	Residues	1

Total Samples: 148

Fishery Products Monitoring Plan 23/24

Port	Total Samples	Product	Test
London Gateway	1	Cooked molluscs	Salmonella/Vibrio
London Gateway	7	Cooked crustacean	Salmonella/Vibrio
London Gateway	26	Farmed fishery products	Residues/antimicrobials/dyes
Tilbury	2	Farmed fishery products	Residues/antimicrobials/dyes
London Gateway	9	Fishery products – fish/molluscs/cephalopods/crustaceans	Cadmium/Lead/Mercury
Tilbury	1	Fishery products – fish/molluscs/cephalopods/crustaceans	Cadmium/Lead/Mercury
London Gateway	7	Fishery products associated with high amounts of histidine	Histamine
Tilbury	1	Fishery products associated with high amounts of histidine	Histamine
London Gateway	1	Dried fish	Irradiation
London Gateway	1	Imitation crab claws from India	E. coli/Staphylococcus Aureus
London Gateway	2	Oily fish	Dioxins/PCBs

Total Samples:58

Committee(s): Port Health and Environmental Services – For decision	Dated: 30/05/2023
Subject: Reduction and Recycling Plan 2023 - 2025	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	4,5, 11
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of: Executive Director Environment	For Decision
Report author: Joe Kingston, Assistant Director Gardens and Cleansing	

Summary

The City of London Corporation is required to produce a Reduction and Recycling Plan (RRP) for 2023 – 2025 setting out actions and targets which help drive our own recycling performance and contribute towards achieving the London-wide goals in the Mayor of London's Environment Strategy (LES).

The City Corporation's RRP has been reviewed by the Greater London Authority (GLA) to ensure conformity and was determined to be a comprehensive RRP that includes a good number and range of actions across the main themes of the London Environment Strategy.

Recommendation(s)

Members are asked to:

- Approve the Reduction and Recycling Plan 2023 - 2025

Main Report

Background

1. In May 2018, the Mayor of London, Sadiq Khan, published the London Environment Strategy (LES) which sets a vision of London in 2050. The LES covers many environmental aspects such as mitigating climate change, improving air quality, transitioning to a circular economy, and improving waste management in London.
2. The LES sets waste objectives, targets, and minimum service levels for London, which includes objectives to:
 - Drive resource efficiency to reduce waste, focussing on food waste and single use plastic packaging.
 - Maximise recycling rates.
 - Reduce environmental impact of waste activities which have an impact on greenhouse gases and air pollution.

- Maximise local waste sites and ensure London has sufficient infrastructure to manage all waste produced in our region.
3. Some of the key London-wide targets are to:
 - Cut food waste and packaging waste by 50% per person by 2030.
 - Achieve a 50% recycling rate for Local Authority Collected Waste (LACW).
 - Send no biodegradable and recyclable waste to landfill by 2026.
 - London to manage 100% of all waste produced by 2026.
 4. The Mayor of London has not set local targets for each Local Authority. However, each Local Authority was required to develop a Reduction and Recycling Plan (RRP) for 2018 – 2022 which set its own local realistic but stretching targets which contributed to achieving the overarching London-wide targets.
 5. In accordance with GLA requirements, the City Corporation, like all London boroughs, created an RRP for 2018 – 2022 which was approved at this committee in September 2019. The Covid-19 pandemic has impacted on all London Local Authorities ability to deliver some actions in RRP as many of the communications campaigns involved events and face-to-face engagement.
 6. As a result of both the impact of the pandemic and potential legislative changes, the GLA have redefined RRP timescales and have asked all London boroughs, and the City Corporation, to create a new RRP for 2023-2025 (and not 2022 – 2026 as had previously been set out in the LES).
 7. The new 2023 – 2025 RRP, which is the subject of this report, contains several actions including reviewing policies, service arrangements, implementing behaviour change activities, and readiness for potential legislative changes required by the Resource and Waste Strategy.

Current Position

8. The City Corporation's 2023-2025 RRP is Appendix 1 of this report. It contains a dashboard with a set of performance targets and a list of 32 actions covering themes such as maximising recycling, waste reduction, and reducing environmental impacts.
9. Some of the actions, tasks and projects set out in the RRP include:
 - Encourage Circular Economy behaviours in residents by continuing with Give and Take Days, Tech Takebacks, repair workshops etc.
 - Trial bulky reuse collections to enable reuse of items.
 - Campaigns to divert recycling away from street bins.
 - Identify low performing properties and undertake targeted communications.
 - Increase participation in food recycling services and run food waste reduction campaigns.
 - Engage with businesses to promote requirements of Resource and Waste Strategy.
 - Review Circular Economy statements as part of the Planning Process to reduce carbon emissions/embedded carbon.

10. In accordance with the GLA guidance and process for collating RRP, the City Corporation's RRP has been reviewed by the GLA whose feedback stated the document was a "comprehensive RRP that includes a good number and range of actions across the main themes of the London Environment Strategy" and included a "good level of detail included within actions, with a particularly strong focus on waste reduction, engaging with businesses/commercial properties on waste reduction and recycling and circular economy initiatives" as well as "a number of actions which demonstrate innovation".
11. The City Corporation's RRP is compliant with the minimum household waste service provisions required by the GLA. This includes provision of recycling services to 100% of household properties and providing a separate food waste service to kerbside properties. As the City Corporation does not have any traditional "kerbside" properties a food waste service is provided where space allows. Due to the nature of housing stock in the Square Mile, it is envisaged that it will not be practicable nor possible to increase the number of existing flatted properties receiving food waste recycling services, however the provision of this service is kept under review on a case-by-case basis.
12. The City Corporation is also fully compliant with the ULEZ regulations to improve air quality by having an electric fleet of RCV operating on household rounds.
13. Although commercial waste does not contribute towards the City Corporation's Local Authority Collected Waste (because it is delivered via a commercial partnership with Veolia), the GLA requested the RRP contains actions to engage with businesses within the Square Mile as these will help contribute to achieving the Mayor of London's municipal waste recycling target of 65% by 2030.

Options

14. Option 1 - approve the City Corporation's RRP for 2023 – 2025 as agreed by the GLA and included in Appendix 1. **This is the recommended option.**
15. Option 2 – do not approve the City Corporation's RRP. This would require a re-drafting of the RRP, re-submission to the GLA and bringing the document back to a subsequent meeting of this committee. **This is not recommended.**

Proposals

16. Members are asked to approve the adoption of this RRP. This will provide a clear structure and framework for workstreams up to 2025 as well as compliance with the LES. Additionally, actions within the RRP support other key City Corporation strategies, including the Climate Action Strategy.

Key Data

17. Officers have identified stretching targets for the RRP which includes:
 - Recycling rate - 32% by 2024/25 (28.9% recycling rate in 2019/20 baseline year).
 - Total annual household waste per head - 399g by 204/25 (407kg in 2019/20 baseline year).

18. Officers have identified that some of the biggest gains to contribute to the 3% increase to the recycling rate that is required should come from diverting bulky waste to reuse, increasing participation in food recycling, and focussed/targeted communications to low performing properties.

Corporate & Strategic Implications

19. The RRP 2023-2025 supports actions 4, 5, and 11 of the Corporate Plan. It also supports the delivery of the Climate Action Strategy, Single Use Plastic Policy, Responsible Business Strategy, Air Quality Strategy, and the Local Plan. The Circular Economy Strategy, which is currently in development, will also align with actions contained within the RRP.
20. Financial implications – All of the current actions contained within the RRP are funded through the local risk budget.
21. Resource implications – none
22. Legal implications – none
23. Risk implications – none
24. Equalities implications – individual Equality Impact Assessments will be carried out for all relevant programmes and projects within the RRP as they are planned and performed.
25. Climate implications – the RRP supports the delivery of the Climate Action Strategy
26. Security implications - none

Conclusion

27. The City Corporation have produced a comprehensive RRP that includes a good number of actions across a range of key themes. It contains realistic but stretching targets which conform with the Mayor of London's Environment Strategy. Approval of the RRP will provide a clear framework to enable officers to progress with programmes and projects to increase recycling and minimise waste within the square mile.

Appendices

- Appendix 1 – The City of London Reduction and Recycling Plan 2023 - 2025

Background Papers

Reduction and Recycling Plan (PHES Committee 24 September 2019)

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MAYOR OF LONDON

Part 1 - Reduction and Recycling Plan (RRP)

April 2023 to March 2025

1. Borough context:

The City of London (CoL) is unique amongst London boroughs, it has approx. 8,000 residents and only 7,000 residential properties which are serviced by The CoL. There are also over 500,000 daily commuters (pre-covid pandemic) coming into the Square Mile - our challenges are unique and the tonnages are small relative to other London boroughs.

With only 69 “houses” in the Square Mile (which includes houses on estates and refurbished church towers), 99% of household properties serviced by the CoL are flats. From a waste management perspective, The CoL doesn’t differentiate between Flats above Shops (FAS), purpose built flats or other types of properties, but only by the type of collection a property receives, these being;

- collections from communal binstores and the four estates in the City (approx., 89% of collections) and
- on street-collections from the remaining 11% properties which do not have access to a binstore and place their bags on the street for collection in compliance with CoL Time-Banding hours.

All residential properties receive a recycling and general waste collection six days per week. A food waste collection service is provided where there is sufficient space in communal binstores to place a food waste bin. Food waste is collected three times per week from binstores. Approx. 35% of properties do not receive a food waste service due to lack of space within the binstore or due to the fact that they receive on-street collections, where the placement of food waste bags, potentially producing leachate on busy pedestrian footways is seen as prohibitive.

The CoL will face significant challenges providing food waste service to all properties due to the nature of housing stock and having to place food waste on the street for collection. Additionally, with only 69 houses, the CoL does not have the plentiful supply of gardens and grass which often increase recycling rates in outer London boroughs. In the CoL, space, a transient population and second homes are our main limiting factors, barriers and challenges. Communal binstores have limited space for additional services e.g. textile recycling, and there are no large communal public spaces for bring banks to capture additional materials e.g. supermarkets. It is due to these space limitations that there is also no HWRC in the City of London – residents can instead use the Tower Hamlets HWRC. However, material streams such as textiles, batteries, small domestic appliances and low energy light bulbs can also be recycled where space allows in estate binstores and in libraries.

The CoL is still feeling the impact of the covid pandemic on Local Authority Collected Waste (LACW); In 2020-2021, LACW decreased by approx. 15%, food waste sent for composting experienced an 8% drop, and kgs per household dropped approx. 18% when compared to 2019/2020. This did however contribute to a recycling rate increase of 3%. At time of writing, LACW is returning to pre-pandemic levels however, street cleansing is approx. 15% less than pre-pandemic although this is likely to change as workers and tourists return to the Square Mile. The CoL doesn’t yet have a “new normal” for our waste tonnages or patterns post covid, this is in part driven by having approx.. 20% of the 8,000 properties registered for council tax being second homes. This provides a significant challenge when producing modelling for 2025.

2. Key strategic documents linked to this plan:

This RRP has been developed in line with

- [Climate Action Strategy](#)
- [Single Use Plastic policy](#)
- [Responsible business strategy 2018 – 2023](#)
- [Responsible procurement policy](#)
- [Air Quality Strategy 2019-2024](#)
- [City of London Local Plan 2015](#)
- Circular Economy Strategy (in development)

3. RRP Dashboard

Set Common Performance Targets	Baseline Performance (2019/20)	Performance Target 2024/25	Metric Guidance / Data source	Target Guidance
Total annual household waste per head (kgs/head)	407.11	399	Defra stats (Ex BVPI84a)	Borough sets own targets, informed by ReLondon (RL) /WRAP good practice.
Total annual household residual waste collected per household (kgs/household)	379.49	369.67	Defra stats (Ex NI191)	Borough sets own targets, informed by RL/WRAP good practice.
Total annual household avoidable (edible) food waste (kgs/head)	77	76	Borough to estimate based on own or RL/WRAP food waste composition data. Estimates should be based on avoidable food waste produced (i.e. not just food waste collected).	Based on estimated avoidable food waste produced. Borough to set own targets, informed by RL/WRAP good practice and support programmes (e.g. Trifocal). Based on 77kg/capita/year figure provided by WRAP
Annual household waste recycling rate (% by weight)	28.9	32	Defra stats	Borough sets own targets, informed by RL/WRAP Route map modelling and other good practice. The GLA will use the borough recycling benchmarking table in the Route Map modelling as a reference point when assessing local authority targets set in the RRP process (See Appendix 2 of the London Environment Strategy, page 111: https://www.london.gov.uk/sites/default/files/les_appendix_2_-_evidence_base_0_0.pdf)
Annual LACW recycling rate (% by weight)	23.	23	Defra stats	Borough sets own targets, informed by RL/WRAP good practice. Targets should at least match household recycling targets, going beyond the Mayor's 50 per cent LACW recycling target by 2025 where possible. LACW is lower than household recycling rate as waste collected from street cleansing, street bins, parks/gardens and wholesale markets (including Smithfield meat market) disproportionately impacts our recycling tonnage. Service provision in these areas kept under review at all times.
Proportion (%) of properties receiving the Mayor's minimum level of service for household recycling	100	100	Borough to take from own info	Borough sets own target, informed by RL/WRAP good practice All residential properties receive a recycling collection – the CoL do not differentiate between flats above shops (FAS)/ communal / kerbside etc but only two types of collections: street collections (properties without a binstore) and communal collections (properties with a binstore, including estates)
% of kerbside properties (all households on a kerbside collection) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays) <u>and separate food waste</u>	0	0	Borough to take from own info. Separate food waste does not include co-mingled with garden waste	Borough sets own target, informed by RL/WRAP good practice. Separate food waste does not include co-mingled with garden waste Kerbside in this context for the CoL refers to 11% housing stock – vast majority of which are flats- which places bags on the street for collection and doesn't receive a communal binstore collection. No properties on street collections receive a food waste service due to footfall, hygiene and time-banding. Whilst it is likely to be a requirement of the RWS to provide a food waste service to all properties, this is unlikely to be possible in the CoL
% of kerbside properties (all households on a kerbside collection) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)	100	100	Borough to take from own info (Nb included for boroughs that are unable to provide food waste collections due to long term contractual issues. If not applicable please state NA).	Borough sets own target, informed by RL/WRAP good practice. Kerbside in this context for the CoL refers to 11% housing stock – vast majority of which are flats - which places bags on the street for collection and doesn't receive a communal binstore collection. All household properties serviced by the CoL receive a recycling collection.
% of flats (communal collections and flats within commercial buildings, excluding flats above shops) collecting six main dry materials <u>and separate food waste</u>	65	65	Borough to take from own info. Please provide estimate for flats within commercial buildings if lacking data.	Borough sets own target, informed by RL/WRAP good practice. Approx 89% housing stock receives a communal collection. Some 65% of properties receive food waste service – this is provided where space allows in the binstore and available to all residents on the four estates. We do not anticipate this number changing due to the nature of the existing binstores and inability to place food on street for collection. However, provision of food waste to properties is always kept under review.
% of flats (communal collections and flats within commercial buildings, excluding flats above shops) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays).	100	100	Borough to take from own info. Please provide estimate for flats within commercial buildings if lacking data. (Nb included for boroughs that are unable to provide food waste collections due to long term contractual issues. If not applicable please state NA).	Borough sets own target, informed by RL/WRAP good practice. As per above, all residential properties receive a recycling collection

	Baseline Performance (2019/20)	Performance Target 2024/25	Metric Guidance / Data source	Target Guidance
Set Common Performance Targets				
% of flats above shops (FAS) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)) <u>and separate food waste collection</u>	n/a	n/a	Borough to take from own info.	Borough sets own target, informed by RL/WRAP good practice and FAS data. The CoL does not differentiate between different types of flats e.g. FAS / communal / kerbside /estates etc but only two types of collections; street collections (properties without a binstore) and communal collections (properties with a binstore, including estates). No info is held on FAS – see figures above for kerbside (street) and communal figures
% of flats above shops (FAS) collecting six main dry materials (glass, cans, paper, card, plastic bottles and mixed rigid plastics (pots, tubs and trays)).	n/a	n/a	Borough to take from own info.	Borough sets own target, informed by RL/WRAP good practice and FAS data. The CoL does not differentiate between different types of flats e.g. FAS / communal / kerbside /estates etc but only two types of collections; street collections (properties without a binstore) and communal collections (properties with a binstore, including estates). No info is held on FAS – see figures above for kerbside (street) and communal figures
Proportion (%) of waste fleet heavy vehicles that are ULEZ compliant	100	100	See www.tfl.gov.uk/modes/driving/ultra-low-emission-zone	
Performance of LACW activities against the Mayor's EPS (tonnes of CO2eq per tonne of waste managed).	-0.047	-0.085	Use tool found here Boroughs to set by uploading WDF data into the GLA tool. GLA will provide EPS training in spring 2022.	Borough to run their own scenarios using GLA tool to determine planned service changes (DSO borough) or new contract options against the EPS for target years (2024/5). See London Environment Strategy Proposal 7.3.2.b

4. RRP Actions: Part one

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/W DA
COL# 1	<ul style="list-style-type: none"> Waste reduction Maximise recycling Reducing Environmental impact 	Implementation of Circular Economy strategy to lead by example	<ul style="list-style-type: none"> At time of writing, a new Circular Economy (CE) Strategy is in development – expect to launch in 2023. This replaces the CoL waste strategy 2013-2021. As the new CE strategy is in development at time of writing, specific activities have not yet been set. However, some actions are likely to include developing staff understanding of CE to enable staff to identify CE opportunities within their departments, embedding CE within policies and procedures. Additionally, tasks such as promoting reuse sharing platforms, encouraging residents to adopt CE behaviours and more are tasks which also form part of this RRP. Anticipate at least some actions from the CE strategy will be completed during the lifetime of this RRP and other actions to be ongoing CE strategy expected to be focussed mainly on internal operations and the influence which the CoL could have with external stakeholders, for example, through the planning process. Sites located outside the Square Mile may be contained in a subsequent CE Strategy although this will be kept under review. This is so that we can trial actions locally, before rolling out actions to more complex and operationally diverse sites ranging from Port of Tilbury, Heathrow Animal Reception Centre, wholesale markets to Hampstead Heath and more. The CoL Responsible Business Strategy 2018 – 2023 has “waste” as a key priority – we will continue to liaise with colleagues during lifetime of the RBS. The CoL Single Use Plastic Policy (SUP) outlines how we will work with our supply chain, employees and communities to eliminate unnecessary plastic waste and encourages the use of recycled content plastic where there are no other suitable alternatives. As part of this, we are engaging with our stationary supplier to identify where recycled content can be increased and packaging reduced. We will continue to promote the CoL’s preferred internal reuse sharing platform, WARP-it. This sets out to keep resources such as furniture and stationary in use internally thereby keeping resources in use for longer and reducing disposal costs. Unclaimed items are then made available to the wider warp-it network such as schools and charities in our reuse network. The reuse network aspires to reduce waste, encourage reuse and reduce costs of buying items the CoL already has and avoidable disposal costs through providing reusable items to others. We will undertake at least 1 warp-it promotional campaign each to year to promote reuse internally 	<ul style="list-style-type: none"> No impact on LACW but aim to reduce commercial waste produced by CoL sites and construction and demolition sites within the Square Mile. The strategy will include actions to create a baseline figures and metrics around many CoL departments including Procurement, Facilities Management, City Gardens, Planning, Capital Build Projects, Public Realm and Highways, Asset Management and Advocacy and Engagement At least 1 warp-it promotional campaign internally per year 	<ul style="list-style-type: none"> CE Strategy launch in 2023 – actions and timescales TBC 2023 – 2025 Until 2023 Ongoing ongoing 	Unitary
COL# 2	<ul style="list-style-type: none"> Waste reduction Maximise recycling Reducing Environmental impact 	Encourage Circular Economy (CE) behaviours amongst residents to reduce waste and encourage reuse and repair	<ul style="list-style-type: none"> Further to the expiry of the CoL waste strategy, we will continue to implement initiatives that encourage and support our residents to take responsibility to reduce the overall household waste they produce e.g. promote campaigns such as Love Food Hate Waste, No Junk Mail, Real Nappies etc Additionally, we will also e.g. promote refill and avoiding single use plastics to reduce waste to name a few. We will also provide services and initiatives that encourage the reuse of items therefore diverting these materials from final disposal and also reducing waste. e.g. continue to grow our “Do more than just recycling” webpage which provides CE guidance, link with “mindful shopper” website, continue popular events such as Give and Take Days, Tech Takebacks, food cookery workshops and more beside to reduce waste, encourage reuse and repair. We will also promote national and international campaigns such as Recycle Week, International Week of Waste Reduction, Repair Day etc and run events where resources allow. 	<ul style="list-style-type: none"> Reduction in residual waste for disposal and consumption-based carbon emissions; increased awareness on the circular economy. Organise at least 4 x Give and Take Days per year Organise at least 1 x Tech Takeback per year when funding allows 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 3	<ul style="list-style-type: none"> Waste reduction 	Introduction of a “maker space” to support reuse and repair and CE behaviours	<ul style="list-style-type: none"> Artizan Street library will be introducing a maker-space in mid-2023 where reuse and repair workshops will be run to enable residents and workers to repair and reuse their textiles. This will help to reduce waste and encourage CE behaviours. We will work with the library and communicate with residents, workers and visitors to promote repair workshops. 	<ul style="list-style-type: none"> Host at least 1 x textile repair workshop per year in maker space 	<ul style="list-style-type: none"> Maker space to open in mid-2023 	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> We will continue to work with libraries and other public spaces to ensure that communal areas can be used to support residents to make their belongings last longer. 			
COL# 4	<ul style="list-style-type: none"> Waste reduction 	Support refill opportunities to reduce plastic / packaging	<ul style="list-style-type: none"> We promote activities that support refill and reduce plastic / single use plastic packaging such as the Refill app and signpost towards the CoL 15 drinking water refill points. We will look into options for increasing refill opportunities in the Square Mile e.g. TopUp Truck, refilling dry foods, household detergents etc to support and encourage residents to reduce waste and refill where possible. 	<ul style="list-style-type: none"> Reduction in single use plastic and consumption-based carbon emissions; increased awareness of reuse and the circular economy. 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 5	<ul style="list-style-type: none"> Waste reduction 	Food waste prevention campaigns	<p>The CoL is a founding fee paying member of the ReLondon food working group which aims to identify the reasons why and how food is wasted. We will continue to input into this process which aims to run food waste reduction campaigns in 2023 – 2024. The campaign is called “Eat Like a Londoner” and will be focussed on behaviour change. We will promote and engage with the campaign throughout the lifetime of the campaign.</p> <ul style="list-style-type: none"> Continue to link with Love Food Hate Waste (LFHW) / other food campaign messaging in future to reduce amount of food waste produced at home. This will be promoted via traditional and digital channels. The provision of information stands and cookery demos are subject to funding and resources. Explore partnership and local promotion of food waste reduction apps eg. Olío, Kitche & the 'Too Good To Go' apps to reduce waste and enable food sharing Explore options for working with or signposting towards initiatives such as community fridges/surplus to purpose etc to help keep unwanted food from City operations in use for longer. Review procurement contracts for sites with catering to check for clauses re unwanted / surplus food. Explore options to partner with the Food Flagship Initiative - for example a project to reduce the environmental impact of school meals, or a food redistribution network by March 2025. 	<ul style="list-style-type: none"> Awareness raising of ways to reduce food waste Subject to approval, promotion of the Olío, Kitche and Too Good to Go apps via City communications channels to help reduce avoidable food waste Establish process for ensuring catering contracts account for food waste Reduce kg/head and reduce carbon based emissions 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 6	<ul style="list-style-type: none"> Waste reduction Maximise recycling 	Review Resource and Waste (RWS) Strategy requirements to provide food waste service to all residential and commercial properties and increase participation in existing recycling services	<ul style="list-style-type: none"> As part of the RWS requirements to provide food waste service to all households, we will review options for rolling this out to the remaining housing stock – approx. 35% - which doesn't already receive a food recycling service. Non-provision to these sites is due to lack of space within binstore for a food bin or property receives a street collection. The City of London currently provide tri-weekly separate food waste collections for approx. 65% of housing stock. However, the CoL do not believe that it is possible and practical to introduce food waste to all street properties, although we will explore options as to how we may be able to deliver food services to all properties. As the CoL does not operate a commercial waste service we will work with our commercial waste collection partner, Veolia, to ensure they are providing separate food waste collections to commercial waste properties as this was part of the City's specification when the portfolio of commercial waste was included in a wider tender exercise in 2019. To further support the requirement for commercial properties, we can engage with businesses via the Clean City Awards, Heart of the City, BIDS and other business networks to help ensure compliance. We will review the existing provision of food waste to all properties currently receiving this recycling service and take action to increase participation. Actions will include updating signage in accordance with ReLondon toolkits, reviewing operations and communications promoting the recycling service. 	<ul style="list-style-type: none"> Do not' believe we can roll out food waste to additional properties (street) and therefore minimal impact however, through promotion and refresh of existing food waste service, estimate contributing approx. 1% to recycling rate by 2025 Maximise recycling from local businesses, which contributes to achieving the Mayor's municipal waste recycling target of 65% by 2030 	<ul style="list-style-type: none"> Review operational options in 2023-2024 	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
COL# 7	• Waste reduction	Trial reusable containers to reduce packaging on the go	<ul style="list-style-type: none"> Explore options to trial reusable containers e.g. takeaway packaging, cups etc at City events e.g. lunch markets. This could be extended to include trials at office canteen e.g. trial caulibox to encourage reuse of packaging, rather than use single use / compostable packaging. 	<ul style="list-style-type: none"> Reduction in residual waste for disposal and consumption-based carbon emissions Increased awareness of reuse and circular economy 	• Trial potentially begin 2023/2024	Unitary
COL# 8	<ul style="list-style-type: none"> Waste reduction Maximise recycling 	Encourage greater composting of Christmas trees from private blocks	<ul style="list-style-type: none"> As less than 1% of dwellings are houses, we are not able to promote home composting as a way to reduce waste as there are very few, if any, private gardens. The four housing estates in the Square Mile have communal outdoor space however installation of compost bins on estates has previously been denied for variety of reasons including lack of ownership / control of compost heap and communal gardens managed by different department. The CoL continues to provide Christmas Tree recycling service whereby real Christmas Trees will be composted. We will review operations to assess options to capture more Christmas trees from private blocks with would otherwise end as general waste. This would reduce waste and increase recycling. We will also signpost residents to renting a Christmas tree to keep trees alive and in use for longer and reduce the need for compost, thus further moving towards CE behaviours. 	<ul style="list-style-type: none"> On average, Christmas Trees contribute approx. 1 – 2% of each January recycling rate, therefore, contribution towards 2025 recycling rate will be minimal Greater awareness of circular economy by signposting towards renting trees 	• Promote renting trees in Oct – Dec each year	Unitary
COL# 9	• Waste reduction	Bulky reuse opportunities	<ul style="list-style-type: none"> As there are no charity shops or HWRC in the Square Mile, there are limited opportunities for residents to make unwanted bulky items available for reuse. Previous trials to reuse bulky items have proved challenging, however we will run another bulk reuse trial in 2023/2024 • Additionally, as part of our Give and Take Days, we will continue to offer residents on the “host estate” free bulk collections on the day of the event to enable residents to make their bulk items available for reuse at the event to keep these items from being thrown away and support Circular Economy principles. 	<ul style="list-style-type: none"> Volume of items for reuse unknown however, estimate contribute approx. 0.5% towards 2025 recycling target Contribute to reducing LACW and raise awareness of reuse and circular economy 	<ul style="list-style-type: none"> Prepare for trial in Spring 2023. Launch trial in summer 2023 Review trial in Winter 2023 with view to potentially rolling out 	Unitary
COL# 10	<ul style="list-style-type: none"> Waste reduction Maximise recycling 	Review residual waste provisions	<ul style="list-style-type: none"> Currently, all CoL properties receive a 6pw collection of recycling and general waste. As the majority of our residential population use communal bins, we are unable to restrict size of containers or identify individual properties (flats) producing a lot of waste or not recycling. We will seek to explore to the feasibility of restricting residual waste in some way e.g. shut off /reduce operational chutes. If this is a feasible option, a trial would need to be approved by Committee as would any long-term changes. If it is feasible to shut of chutes, we will undertake consumer behaviour change activities with residents to reduce waste, e.g. promote food waste campaigns such as LFHW, link to mindful shopper and encourage CE behaviours to reduce waste. Support will also be provided to building managers and concierges to ensure they are fully aware of restrictions. We will also strive to help them manage their residents waste appropriately to minimise waste and increase recycling. Promote changes via traditional and digital channels in addition to promoting recycling services. We would seek to use Resource London's communication expertise to convey messages appropriately. We would use Resource London templates, and resources where appropriate. 	<ul style="list-style-type: none"> Contribute to reducing household waste kg/head or kg/household Expected impact could also be affected by outcomes from government consultations such as Deposit Return Scheme, Extended Producer Responsibility and plastic packaging tax which could impact on waste generation 	• Potential for trial in 2024 – 2025 – would need data from RFID tags (below) to identify areas/monitor impact	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
COL# 11	• Waste reduction • Maximise recycling	Identify low performing flats via RFID tags	<ul style="list-style-type: none"> The CoL have installed bin weighing equipment on all of our refuse and recycling collection vehicles, this will allow us to identify properties deemed to have a high refuse:recycling ratio with a view to encouraging greater recycling in these properties and signpost towards waste reducing behaviours. We will communicate with residents via traditional and digital channels in addition to promoting recycling services. We will seek to use Resource London's communication expertise to convey messages appropriately. We will use Resource London templates, and resources where appropriate and provide targeted communications. 	<ul style="list-style-type: none"> Estimate targeted communication contribute approx. 1% towards 2025 recycling target Identify properties with low recycling rates and identify 3 to trial communication campaign / interventions by 2023/2024 and roll out to more locations in 2025 	<ul style="list-style-type: none"> Analyse 6m of data in 2023 - 2024 Identify 3 x properties in Winter 2023 Analyse impacts of recycling campaign in 2024 	Unitary
COL# 12	• Waste reduction • Maximising recycling • Maximising local waste sites	Circular Economy statements in planning	<ul style="list-style-type: none"> The CoL strives to incorporate CE principles around the Square Mile and lead by example. To help build a more sustainable Square Mile, we are actively requesting CE statements in planning applications and commenting to ensure that CE principles are incorporated in the design stages of building to reduce waste, increase recycling and maximise potential throughout the design, build and deconstruction part of the process. 	<ul style="list-style-type: none"> No impact on LACW but greater awareness of circular economy and reduction of waste produced in square mile 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 13	• Maximise recycling	Diverting recyclables away from street bins	<ul style="list-style-type: none"> Introduce campaign to encourage people to take waste back to office/home where they should be better able to recycle it rather than placing in the street bins. Initiate campaign to divert recyclables away from street general waste bins to reduce LACW waste and increase commercial recycling. Potential for info stands to be located next to designated trial bins to promote messaging, in which items such as reusable bottles could be given away to further reduce waste, encourage behaviour change and promote circular economy behaviours. 	<ul style="list-style-type: none"> Contribute towards reducing LACW and increasing commercial recycling Maximise recycling from local businesses, which contributes to achieving the Mayor's municipal waste recycling target of 65% by 2030 	<ul style="list-style-type: none"> Trial to commence in 2023 	Unitary
COL# 14	• Waste reduction • Maximise recycling • Reducing environmental impact	Leading by example – external action; Business engagement activities to reduce waste and improve waste management systems overall	<ul style="list-style-type: none"> Through the City's unique Clean City Award Scheme (CCAS) and by working with the Business Improvement Districts (BIDS), we will strive to continue to run business engagement activities through which we will disseminate information and best practice to reduce waste, embrace CE principles, improve air quality and improve waste management systems. We will use existing communication channels (e.g. social media, linked in, CCAS newsletter for members, other business schemes) to educate businesses on the importance of reducing waste, increasing recycling, reducing environmental impact and moving towards CE behaviours We will also adopt and link with Resource London behaviour change activities and the CoL has also featured in a ReLondon case study for communicating with businesses thereby demonstrating our keenness to share best practice with others. We are working with our commercial collection partner to engage with businesses and ensure customers are provided with a recycling collection service for at least the six main materials and food waste as a minimum to reduce waste and maximise recycling. The CoL will monitor WRAP's Business Recycling Support Pilots which are due for completion in mid 2023. We will implement best practice / lessons learnt from the pilots as / when appropriate to do so with a view to increase business recycling and reducing waste. 	<ul style="list-style-type: none"> Maximise recycling from local businesses, which contributes to achieving the Mayor's municipal waste recycling target of 65% by 2030 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 15	• Maximise recycling	Improve communal bin areas in accordance with Flats Recycling Project	<ul style="list-style-type: none"> Following successfully using the Flats Recycling Project guide to improve an estate's bin area, we will improve communal bin areas on additional estates in line with best practice identified in Flats Recycling Project subject to funding. Aim is for this project to link in with review of RFID data to identify/ improve low performing area/s on estate/s. 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target 	<ul style="list-style-type: none"> Ideally to link with analysis of RFID project Up to 5 communal binstores to be reviewed by 2025 	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> • We will engage with stakeholders – estate staff, residents, etc to advise about changes to binstores if any are made and encourage participation in recycling service as there may be cost implications e.g. painting binstores, refurbishing bins etc. • This will be supported by communication campaign using ReLondon, WRAP best practice and toolkits etc. • We will review options to include recycling in tenancy agreements where possible. 			
COL# 16	• Maximise recycling	Refresh and audit binstores provisions	<ul style="list-style-type: none"> • We will undertake an audit of binstores, re-stickering bins with stickers produced from Flats Recycling ReLondon toolkits. • We will use these binstore audits as an opportunity to identify barriers which may prevent residents from recycling or recycling all that they can, identify solutions where possible and implement best practice identified by Flats Recycling Project where practical and financially viable to do so. • We will also review space to identify if additional materials can be captured in binstores e.g. food, batteries, textiles etc, although this has been and will continue to be an ongoing process. Additionally, binstore audit will form part of process for RWS preparations e.g. assessing space for the provision of food to all locations / space for separate containers etc pending confirmation of requirements to comply with the RWS consistency requirements. • We will use binstore audits / restickering bins as an opportunity to deliver service leaflets to properties so residents have refreshed communications at the same time. 	<ul style="list-style-type: none"> • Estimate improving binstores could contribute approx. 0.5% towards 2025 recycling rate target 	<ul style="list-style-type: none"> • Audit of binstores to be completed by Winter 2023 • Ongoing assessment of space for services 	Unitary
COL# 17	• Maximise recycling	RWS requirements to collect core materials separately from households and businesses	<ul style="list-style-type: none"> • Previous TEEP assessment identified that the provision of multiple containers is technically impracticable in CoL binstores. Furthermore, this would also create a hazard when multiple containers placed on street for collection. This would also be financially unsustainable as has previously been identified by the TEEP assessments. • This action links with the binstore audit as we will re-assess space within binstores for innovative ways to collect food waste from properties which do not currently receive this service and additionally complete audits / TEEP assessments for collecting core materials separately when the requirements of the RWS are confirmed. • Should we be required to provide separate recycling for core materials, we will engage with residents using ReLondon and WRAP guidance and toolkits. • As the CoL does not operate a commercial waste service we will work with our commercial waste collection partner, Veolia, to ensure they are complying with the RWS requirement. • To further support the requirement for commercial properties, we can engage with businesses via the Clean City Awards, Heart of the City, BIDS and other business networks to help ensure compliance. 	<ul style="list-style-type: none"> • Do not expect to be able to collect materials separately due to space restrictions and therefore expect no impact on services provided in binstores • Maximise recycling from local businesses, which contributes to achieving the Mayor's municipal waste recycling target of 65% by 2030 	<ul style="list-style-type: none"> • Audit of binstores to be completed by Winter 2023 	Unitary
COL# 18	• Maximise recycling	Keep recycling services under constant review	<ul style="list-style-type: none"> • The CoL strives to keep recycling services provided to residents under review in all locations e.g. undertaking recycling trials including of garden waste, providing public textile recycling bins in libraries etc. • The CoL is in conversation with Podback to assess viability to trial collection of coffee pods from communal locations. Whilst this would have minimal impact on recycling rates, costs would be borne by Podback as part of an EPR and demonstrates CoL commitment to trial / provide recycling services where possible. • We will also undertake review of space within CoL car parks to ascertain whether additional recycling services can be installed e.g. textile, WEEE recycling etc. 	<ul style="list-style-type: none"> • Contribute to 2025 recycling rate target 	<ul style="list-style-type: none"> • ongoing 	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
COL# 19	• Maximise recycling	Review RWS requirements to collect garden waste from properties with garden	<ul style="list-style-type: none"> The CoL has 69 houses and the remaining housing stock is flats. The majority of properties do not have gardens and there are no front gardens. Trials were undertaken in 2018 and 2022 for collecting garden waste from flats; two estates and a private block which have window boxes. The results from the 2022 trial completed in November 2022 identify that incorporating a seasonal garden waste service is not a viable option owing to low tonnages. Instead, options for residents to recycle / compost their green waste will be explored in 2023 e.g. communal composting, rocket composters etc. 	<ul style="list-style-type: none"> Do not expect to be able to collect garden waste owing to housing stock within the CoL and lack of space / garden waste in flats Impact of home composting on recycling rate expected to be minimal due to low tonnages received during trial and lack of residential gardens To be reviewed in 2023 	<ul style="list-style-type: none"> Trial finishes Nov 2022 Review operational options in 2023-2024 for providing garden waste service if no exemptions 	Unitary
COL# 20	• Maximise recycling	Manually collected street sweeping	<ul style="list-style-type: none"> Review quality of manually sorted recycling as collected by street sweepers. Dry Mixed Recycling is collected in split barrows to ensure adequate separation of recycling. We will undertake audits of sweeper collected recycling to ensure correct items are being recycled and identify additional training requirements to aid understanding of recyclable materials. Additionally, street sweepers also collect coffee cups separately from co-mingled recycling. We will continue to work with our contractor to provide toolbox talks to ensure adequate training is provided to sweepers re correct separation of recycling. 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target 	<ul style="list-style-type: none"> Audits to restart in Spring 2023 – repeat every 6 months or as required 	Unitary
COL# 21	• Maximise recycling	Encouraging commercial recycling and compliance with RWS	<ul style="list-style-type: none"> CoL commercial waste has been collected in partnership with our domestic waste collection contractors since 2011. This arrangement continued when the new contract was awarded in 2019 to Veolia. Commercial waste is not included as part of the CoL LACW as this disproportionately impacts our residential recycling rate due to the volume of commercial waste. The contractor is obliged to report on all waste and recycling streams monthly as part of the contract to enable an accurate recycling rate to be calculated. To further support the requirement for commercial properties, we will engage with businesses via the Clean City Awards, Heart of the City, BIDS and other business networks to help ensure compliance. 	<ul style="list-style-type: none"> No impact on LACW Maximise recycling from local businesses, which contributes to achieving the Mayor's municipal waste recycling target of 65% by 2030 	<ul style="list-style-type: none"> ongoing 	Unitary
COL# 22	• Maximise recycling	Improve quality of recycling	<ul style="list-style-type: none"> Given that the majority of our housing stock use communal bins to dispose of waste and recycle, our average MRF contamination rate in 2021-2022, was approx.10% which is below an industry average for this property type. We will encourage better quality recycling and a reduction in recycling contamination by engaging with our contractor and re-introducing contamination stickers and notes through the door for residents on estates. (Estates receive a doorstep collection) 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target Raise awareness of correct use of recycling service 	<ul style="list-style-type: none"> Re-introduce contamination cards in 2023 Monitor impact on MRF contamination rate ongoing 	Unitary
COL# 23	• Maximise recycling	DRS / EPR preparations in accordance with RWS	<ul style="list-style-type: none"> Implications on introduction of EPR and DRS on recycling collections to be investigated in 2023/2024. At time of writing the CoL is trialling a Reverse Vending Machine to trial effectiveness at capturing bottles and cans for recycling in anticipation of an introduction of a DRS / EPR scheme. In process of gathering data on which to base planning. 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target 	<ul style="list-style-type: none"> Review operational options in 2023-2024 impact of DRS / EPR on LACW 	Unitary
COL# 24	<ul style="list-style-type: none"> Maximise recycling Maximising local waste sites 	Boost recycling performance in flats by planning waste provisions	<ul style="list-style-type: none"> As less than 1% of housing stock is houses, we endeavour to boost recycling wherever possible including undertaking doorstepping campaigns, audits and communication campaigns. The CoL Local Plan 2015 includes Development Management Policies which accounts for waste facilities being integrated into the design of buildings which allows for separate storage and collection of recycling and food waste. All bin stores are built to comply with BS5906 specifications. Policy dictates that adequate provision must be made for the volume and types and waste and recyclables expected to be generated, especially paper and packaging waste from offices. Planning conditions relating to waste storage and collection are attached to properties and regulatory powers can also be used. We have dedicated Officers who review waste amenities at planning stage. 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target 	<ul style="list-style-type: none"> Ongoing in nature 	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> To further boost recycling performance, we ensure that recycling is captured in the planning stages of the development of new builds to enable suitable recycling provisions to be built into the design of buildings. We will continue to engage with planners and developers to ensure this continues. We will also keep under review the information contained on webpages to ensure planners/developers are kept informed of CoL requirements for planning for residential (and commercial) buildings. 			
COL# 25	• Reducing environmental impact	Low and zero emission fleet	<ul style="list-style-type: none"> The CoL has already transitioned to zero emission waste fleet for household collections via using eRCVs for household collections, meaning we are helping contribute to Mayor's net zero carbon target by 2030. We continue to upgrade our non-waste fleet when it is appropriate to do so e.g. the expansion of the ULEZ to North and South Circular meant fleet in North London, Epping Forest etc have and continue to change their fleet, however, market constraints for some vehicles persist preventing vehicles being changed to low / zero emission alternatives. We will keep the vehicle market under review. By the end of 2023 all of the City Gardens vehicles will be fully electric Subject to operational requirements, 100% of vehicles owned or leased by the City Corporation are to be electric or hybrid by 2025 	<ul style="list-style-type: none"> Contribute to over 90% Square Mile meeting health-based limits for nitrogen dioxide by 2025 as set out in CoL Air Quality Strategy 2019-2024 contribute to Mayor's net zero carbon target by 2030 	• ongoing	Unitary
COL# 26	<ul style="list-style-type: none"> Reducing environmental impact Maximising local waste sites 	Maintain use of Walbrook Wharf Waste Transfer Station (WWWTS) for refuse disposal	<ul style="list-style-type: none"> The City of London is fortunate to have its own Waste Transfer Station, Walbrook Wharf Waste Transfer Station (WWWTS) in the Square Mile. This is where refuse, including domestic, commercial and street arising collected in the Square Miles departs the Square Mile via WWWTS on barges where the end destination is the EfW plant at Belvedere. Each barge transports 26 containers, thus avoiding 52 return road journeys. Walbrook Wharf is safeguarded for waterborne freight handling use in accordance with the Mayor's London plan https://www.london.gov.uk/sites/default/files/safeguarding_direction_walbrook_wharf.pdf Walbrook Wharf is also a safeguarded waste site – Walbrook Wharf is protected as a waste site which must be re-provided elsewhere if lost to a non-waste use. 	<ul style="list-style-type: none"> Contribute to over 90% Square Mile meeting health-based limits for nitrogen dioxide by 2025 as set out in CoL Air Quality Strategy 2019-2024 contribute to Mayor's net zero carbon target by 2030 	<ul style="list-style-type: none"> Ongoing during lifetime of RRP. WWWTS, whilst owned by the CoL, is operated by Cory. Contract due for tender in 2027. 	Unitary
COL# 27	• Reducing environmental impact	Reduce waste related vehicle movements where possible - river transport	<ul style="list-style-type: none"> WWWTS is used for the disposal of all household and street arisings collected in the Square Mile and additionally third-party contractors use WWWTS to dispose of refuse thus avoiding even more road journeys. We will continue to use river transport to move LACW and third-party commercial waste disposed of at WWWTS 	<ul style="list-style-type: none"> Contribute to over 90% Square Mile meeting health-based limits for nitrogen dioxide by 2025 as set out in CoL Air Quality Strategy 2019-2024 contribute to Mayor's net zero carbon target by 2030 	• ongoing	Unitary
COL# 28	• Reducing environmental impact	Reduce waste related vehicle movements - Waste consolidation in Business Improvement Districts	<ul style="list-style-type: none"> Pre- covid-19 pandemic, the CoL had been working on identifying whether it would be viable to trial a waste consolidation project in the Cheapside Business Improvement District (BID with the aim to reduce vehicle movements and improve air quality). The project was put on hold due to covid and will be re-considered in the future. The CoL now has 4 BIDS with whom we could run a potential future project. The CoL are also interested in looking at the results of waste zoning trials for commercial waste to see if something similar could be implemented in the Square Mile. 	<ul style="list-style-type: none"> Contribute to over 90% Square Mile meeting health-based limits for nitrogen dioxide by 2025 as set out in CoL Air Quality Strategy 2019-2024 contribute to Mayor's net zero carbon target by 2030 	• to be kept under review	Unitary
COL# 29	• Reducing environmental impact	Climate Action Strategy	<ul style="list-style-type: none"> The CoL has a Climate Action Strategy which sets out how the CoL will achieve net zero in carbon emissions, build resilience and champion sustainable growth. We aim to achieve net zero carbon emissions in own operations by 2027. Actions include improving energy efficiency by retrofitting buildings, using renewable energy and embedding CE principles into building projects to reduce carbon intensity. We will continue to link in with the Climate Action Strategy actions. 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate contribute to Mayor's net zero carbon target by 2030 	• ongoing	Unitary

Ref	Theme e.g. • Waste Reduction • Maximising Recycling • Reducing Environmental Impact • Maximising local waste sites • Other	Action title	Action Description	Expected Impact/target	Timescale for action	WCA/WDA
			<ul style="list-style-type: none"> We will continue to promote climate action via the Clean City Award Scheme “Air Quality and Climate Action” category. The new Responsible Procurement Strategy, launched in July 2022 links with Climate Action Strategy and minimises environmental impact on procurement / supply chains. We will continue support and contribute towards the delivery of this. 			
COL# 30	<ul style="list-style-type: none"> Waste reduction Maximise recycling Maximise local waste sites 	Promote greater recycling by promoting Tower Hamlets HWRC	<ul style="list-style-type: none"> As there are no HWRCs located in Square Mile, residents have permission to use neighbouring Tower Hamlets HWRC. Availability of more recycling streams at Tower Hamlets HWRC promoted through digital channels as appropriate and ditto A-Z recycling page on website to reduce waste and maximise recycling 	<ul style="list-style-type: none"> Contribute to 2025 recycling rate target by reducing waste disposed of in the City where some streams can't currently be recycled e.g. wood 	<ul style="list-style-type: none"> Ongoing arrangement with L.B. Tower Hamlets 	Unitary
COL# 31	<ul style="list-style-type: none"> Maximising local waste sites 	CoL as a waste planning authority	<ul style="list-style-type: none"> The CoL is a Waste Planning Authority and therefore there is a statutory duty to prepare a waste local plan which is fulfilled through inclusion of waste policies in City of London Local Plan. The City is unique covering just one Square Mile -with a housing stock of approx. 7,000 residential properties and pre-covid over 500,000 workers each day. We have only one designated waste site (WWWTS – above) and no waste management sites. Therefore, the CoL is reliant on cooperation from other Waste Planning Authorities for capacity as it's not feasible to increase or create capacity within the Square Mile to help the CoL manage more waste within our borders. This is achieved through membership of the South East London Waste Planning Group (SELWPG) and specifically a waste apportionment agreement with the LB Bexley. We will continue to liaise with other boroughs to ensure waste is treated accordingly. 	<ul style="list-style-type: none"> No impact to LACW 	<ul style="list-style-type: none"> Ongoing 	Unitary
COL# 32	<ul style="list-style-type: none"> Maximising local waste sites 	Waste apportionment targets	<ul style="list-style-type: none"> The London Plan has set a waste apportionment figure requiring the City to identify sites with capacity to manage 100,000 tonnes of waste annually until 2031. This figure represents the City's contribution to meeting the Mayor's target of 100% net self-sufficiency in the management of London's waste by 2031. The CoL Waste Capacity Study 2009 identified that there were no viable waste management capacity sites within the Square Mile and that the City will not be able to satisfy the London Plan waste apportionment within its boundaries. <p>We will continue working with the London Borough of Bexley, utilising spare waste management capacity in Bexley, and joint partnership working / contribution to the Southeast London Joint Waste Planning Group's Waste technical paper to ensure that the City's waste apportionment can be met.</p>	<ul style="list-style-type: none"> contribute to Mayor's net zero carbon target by 2030 	<ul style="list-style-type: none"> ongoing 	Unitary

5. RRP Action update template Part one

- To be completed annually
- Action table to be updated with new dates/targets etc at same time

[illegible]

Committee:	Date:
Port Health & Environmental Services Committee	30 May 2023
Subject: High-Level Business Plan 2023/24 – Environment Department	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	2, 3, 4, 5, 10, 11, 12
Does this proposal require extra revenue and/or capital spending?	N
Report of: Juliemma McLoughlin, Executive Director Environment	For Information
Report author: Joanne Hill, Environment Department	

Summary

In March 2023, your Committee approved, subject to the incorporation of some changes, the elements of the Environment Department's high-level Business Plan 2023/24 which fall within the remit of the Port Health and Environmental Services Committee. This report presents, for your information, the final high-level Business Plan with the requested changes incorporated (Appendix A).

The main changes are the addition of KPI performance data for 2022/23 and specific targets for 2023/24; clarification of our strategic commitments in relation to Destination City; and reference has been made to new and developing corporate strategies.

Recommendation

Members are asked to:

- Note the final version of the Environment Department's high-level Business 2023/24, which covers the service areas for which the Port Health and Environmental Services Committee and Licensing Committee are responsible. This version of the Business Plan incorporates changes requested by your Committee in March 2023.

Main Report

Background

1. In March 2023, your Committee approved, subject to the incorporation of some changes, the elements of the Environment Department's draft high-level Business Plan 2023/24 which relate to the service areas within the remit of the Port Health and Environmental Services Committee, i.e.:
 - Public Protection, including the Licensing Service
 - Port Health
 - Animal Health
 - Cemetery and Crematorium
 - Cleansing and Waste.

2. This high-level plan sets out the key areas of work that will be undertaken during 2023/24, all of which are focused on the need to continue to deliver statutory regulatory services in an efficient and compliant manner, while maximising opportunities to reduce expenditure and generate income.

Current position

3. This report presents, for information, the final version of the high-level Environment Department Business Plan with the changes requested by your Committee in March 2023 now incorporated (Appendix A).
 - Key Performance Indicators: the table has been updated to include performance data for 2022/23 and specific targets for 2023/24.
 - Strategic commitments: the text in relation to Destination City has been amended to emphasise that we will support businesses and residents to adapt to the changing the dynamic of the City to a 7 day a week venue and cultural destination.
4. Throughout the year, the Environment Department will report to your Committee on progress made against the workstreams and performance indicators set out in its high-level Business Plan. Updates on key business risks will also continue to be reported on a regular basis. This gives Members the opportunity to scrutinise the department's progress towards achieving its objectives.

Corporate & Strategic Implications - The Corporate Plan outcomes we have a direct impact upon are listed in the Business Plan. The Plan also shows other key City of London strategies we are helping to deliver. Officers will actively engage with colleagues in the Corporate Strategy and Performance Team as they develop the new Corporate Plan.

Financial implications - The high-level Business Plan has been produced in liaison with Chamberlain's Department and takes into consideration opportunities to reduce expenditure and increase income in order to make necessary savings.

Public sector equality duty (PSED) - The Department has established an Equality, Diversity and Inclusion (EDI) Working Group which is working on an EDI Action Plan. Members of the group will lead on a range of EDI actions, including those set out in the Business Plan, to ensure compliance with the PSED across the department.

Resourcing implications - Any changes to resources will be brought to the relevant Committee(s).

Security implications - None

Conclusion

This report presents for information the Environment Department's high-level Business Plan for 2023/24, which now incorporates the changes requested by your Committee in March 2023.

Appendices

Appendix A – Environment Department high-level Business Plan 2023/24

Background papers

'Draft High-Level Business Plan 2023/24 – Environment Department' (28 March 2023)

Joanne Hill

Business Planning & Compliance Manager

Environment Department

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The Environment Department

Shaping sustainable future environments

The Environment Department is the largest in the organisation and provides a diverse range of services to London and the South East.

Within the ‘square mile’ we deliver many local authority and regulatory functions including planning and development; building control; highways and transportation; cleansing and waste; environmental health, licensing and trading standards.

Further afield, we manage over 4,500 hectares of green spaces; run the City of London Cemetery and Crematorium; operate the Heathrow Animal Reception Centre; provide animal health services London-wide; and, as the London Port Health Authority, undertake controls on imported food and feed through London’s ports. The Department’s aims, activities and vision are presented.

Due to the complexity and scope of the department, three separate High-Level Business Plans have been produced to reflect our three key Committee ‘clusters’. This plan covers the service areas which fall within the remit of the Port Health & Environmental Services Committee and the Licensing Committee.



Services within the remit of the Port Health & Environmental Services and Licensing Committees:

Port Health, Animal Health, Public Protection, Licensing, Cleansing and Waste

Looking back: what we achieved in 2022/23...

- The **new Environment Department** came into existence on 1 April 2022, bringing together two and a half former departments.
- The Senior Leadership Team began to embed **consistent working practices** across the new department and identify synergies and opportunities for collaboration and partnership working.
- All service areas continued to work in partnership with relevant **internal and external partners** to fulfil their statutory duties and deliver high-quality regulatory services to the public and City businesses.

Cleansing Service

- Played a **key role in the City's delivery of major events** including the Queens Jubilee and those related to passing of HM The Queen and the accession of King Charles III.
- Contended with a number of pressures, adapting services and invoking contingencies to deal with issues such as **rail and tube strikes** and a record **heatwave** resulting in a hosepipe ban.

Covid recovery

- As business and tourists returned to the city post-Covid, the Public Protection (incl. the Licensing Service) and Cleansing teams adapted their services to deal with the changing patterns of footfall and to support City businesses to recover from the pandemic.

Port Health and Animal Health

- Officers engaged with the UK Government on plans for **new Border controls** to advise and help shape policy.
- Port Health and Heathrow Animal Reception Centre (HARC) continued to deal with **high volumes of trade** through their facilities.
- The Animal Health Team carried out post-import checks for **Ukraine pets** arriving in London, supporting APHA with a new approach to managing quarantine.
- HARC secured use of a **new Border Control Post (BCP)** facility for dogs and cats, through collaboration with a commercial partner.

City Teams (including the Licensing Service)

- Continued development of the Safer City Partnership and Operation Broadway raised the profile of the work of the teams and their successful collaboration with City of London Police and other agencies.
- Continued to drive forward the actions set out in the Environmental Strategies: Air Quality, Noise and Contaminated Land.
- The Licensing Service implemented the transformational **AI Fresco Eating and Drinking Policy** in support of the hospitality sector, providing the City with vibrant spaces.

Cemetery and Crematorium

- The Cemetery and Crematorium retained its **Green Flag and Green Heritage Awards**.
- The Cemetery and Crematorium's new burial area, known as the Haywood Lawn, became operational in Autumn 2022.

How we plan to develop our capabilities in 2023/24

1. Develop our **people**, creating aspirational roles with genuine career progression and job satisfaction that retain and attract **talent**.
2. Invest in individuals' **professional and personal development** and build a sustainable, inclusive, resilient and agile workforce.
3. Improve **staff engagement and collaboration** with enhanced cross-departmental working to share knowledge, expertise and experience.
4. Develop effective, collaborative, **business partner relationships** with other departments, particularly HR and City Surveyors.
5. Review existing working practices and procedures to ensure **effective and efficient service delivery**; establish who does what and why, and consider alternatives.
6. Develop our use of **information**, digital information systems and dissemination, to support delivery of services that are intelligence led, data-driven and evidence based.
7. Identify further opportunities to work with external agencies to **deliver impactful results**.
8. Conduct stakeholder analysis and engagement to ensure each service area **maximises its full influencing potential**.
9. Address significant budget pressures; review our potential for delivery of commercial services and construct mechanisms to **enable and facilitate successful delivery**.

Our major workstreams this year will be...

- Assess and implement requirements for meeting new **air quality** statutory obligations following the introduction of the Environment Act 2021.
- Influence, prepare for and adapt to embed a new **Border Operating Model** for import controls at the end of 2023, by influencing policy and guidance, and designing resilient services that are flexible and dynamic to changing risks.
- Embed the **Climate Action Strategy** and Climate Resilience mitigations into resource planning and decision making - balance reduction of energy use against cost of investment to achieve savings. Identify appropriate vehicles and equipment savings, building retrofits etc.
- Develop a combined services strategy for the **Cleansing and City Gardens** teams, outlining service standards and public engagement plans.
- Support the drafting of a revised **Corporate Transport Policy**.
- Deliver the **Biodiversity Action Plan**.
- Public Protection Teams (incl. the Licensing Service) will continue to assess and adapt services in reaction to the **Night Time Economy** and Anti-Social Behaviour.
- The Licensing Service will develop a long term (10 year) strategy for the City of London on **AI Fresco dining** for the City's Streets.
- Implement and embed the new **Planning and Regulatory Services casework management system (CMS)** to provide a modern and intelligent way of working for the future.
- At the **Cemetery and Crematorium**, monitor funeral trends and adapt to provide a variety of options relevant to the needs and preferences of customers.
- Review the **Port Health accommodation** along the Thames to ensure that it is cost effective and meets future service demands.
- Develop a strategic approach for the future of **Walbrook Wharf** and how this will affect service delivery and contracts.

Our Key Performance Indicators	Performance 2022-23	Target 2023-24
Cleansing: Percentage of City land with unacceptable levels of litter, graffiti etc.	1.29%	<5%
Cleansing: Percentage of household waste sent for reuse, recycling or composting.	29.47%	32% (by 2025)
Cleansing: The number of members of the Community Toilet Scheme.	72	75
Air Quality: Increase the percentage of the City's area that meets the health-based Limit Values and WHO Guidelines for nitrogen dioxide levels by 31 March 2023. (Ultimate target is 90% by 31 March 2025).	Figures not yet available	Increase
Port Health: 85% of imported food and feed consignments that satisfy the checking requirements cleared within 5 days: a) Products of Animal Origin (POAO) b) High Risk Products of Non-Animal Origin.	79% 94%	85% 85%
Port Health: 85% of imported food and feed consignments (Products of Non-Animal Origin) are subjected to mandatory documentary controls within 5 days.	94%	85%
HARC: Acceptance of at least 90% of airline bookings for pets. (New measure for 2023/24)	n/a	90%
HARC: 95% of flight collections attended within 30 minutes of the flight offloading. (New measure for 2023/24)	n/a	95%
Animal Health: All operators meet the required standards when inspected for animal activities licences: a) 80% meet minimum standards (New measure for 2023/24) b) 20% meet higher standards (New measure for 2023/24)	n/a n/a	80% 20%
Pollution control: 90% of justifiable noise complaints investigated result in a satisfactory outcome.	100%	90%
Food safety: Sustain improvement in the proportion of food establishments that are at least 'broadly compliant' (i.e. Food Hygiene Rating Scheme score of 3 or above).	Improved profile	Improved profile
Health & Safety: Sustain improvement in the proportion of premises with notifiable evaporative cooling devices found to be 'broadly compliant' for legionella control (equivalent to health & safety inspection rating of B2 to C). (New measure for 2023/24)	n/a	Improved profile
Licensing: Ensure that, within 12 months, 90% of licensed premises entering the red or amber zone of the Traffic Light Scheme are brought back to the amber or green zone, respectively.	Figure not yet available	90%
Cemetery & Crematorium: Number of burials and cremations. (target based on 5-year average)	3,290	3,290

Our strategic commitments

Climate Action Strategy

- Embed climate resilience as a key component in decision making.
- Develop a plan to protect public health from urban heat effects.
- Reduce pollution and increase the resilience of the Square Mile.
- Develop service-based Climate Adaptation Plans.

Circular Economy Strategy

- Promote and enforce a policy of eliminating unnecessary single use items and lead by example.
- Deliver a successful programme of City-wide Circular Economy events.
- Work across departments to embed Circular Economy principles in all aspects of our work. Explore income streams to offset the increase in expenditure.

Destination City

- Support City businesses and residents to adapt to the changing dynamic of the City to a 7-day a week venue and cultural destination.
- Balance the needs of the businesses, residents and visitors.

Air Quality Strategy

- Ensure that the City complies with the statutory requirements for London Local Air Quality Management.
- Demonstrate leadership for London by implementing the actions identified in the Air Quality Strategy 2019-2024 and further obligations outlined in the Environment Act 2021.

Noise Strategy and Contaminated Land Strategy

- Continue to develop, and implement the actions identified within, the Noise Strategy 2016-2026 and Contaminated Land Strategy 2021-2030.

Apprenticeship Strategy

- Promote and prioritise apprenticeships to build our capacity and provide the skills that we need both now and for the future.
- Utilise apprenticeships as a staff development tool by offering them to existing employees to upskill our workforce whilst they remain in employment, contributing to the department.

Safer City Partnership Strategy

- Actively participate in the Safer City Partnership, particularly in respect of the Anti-Social Behaviour and Night-time Economy workstreams.

We will actively work to deliver, and provide advice on, other relevant Corporate strategies, policies and programmes, including (but not limited to):

- | | |
|--|---|
| • Transport Strategy | • The Local Plan |
| • Licensing Policy | • The City Plan 2040 |
| • City of London Code of Good Practice for Licensed Premises | • Health, Safety and Wellbeing Strategy |
| • Street Trading Policy | • Social Mobility Strategy |
| • Secure City Programme | • Responsible Business Strategy |
| • The Recovery Taskforce | • Corporate Volunteering Strategy |
| • Housing Strategy | |
| • Lighting Strategy | |

We will review any new strategies as they are approved and consider how our services can and will support their delivery during 2023/24 and in future years.

The Corporate Plan outcomes we have a direct impact on are...

Contribute to a flourishing society

1. People are safe and feel safe.
2. People enjoy good health and wellbeing.
4. Communities are cohesive and have the facilities they need.

Support a thriving economy

5. Businesses are trusted and socially and environmentally responsible.
6. We have the world's best legal framework and access to global markets.

Shape outstanding environments

11. We have clear air, land and water and a thriving sustainable natural environment.
12. Our spaces are secure resilient and well maintained.



Our Corporate and Departmental business risks *

Risk Title	Score
Air Quality (Corporate Risk)	AMBER, 12
Brexit – Impact on Port Health and Animal Health	RED, 24
Road traffic collision caused by City of London staff or contractor who is unfit to drive while on City business	RED, 16

* Risk details were correct at January 2023 but are subject to continual review and change.

Operational Property requirements

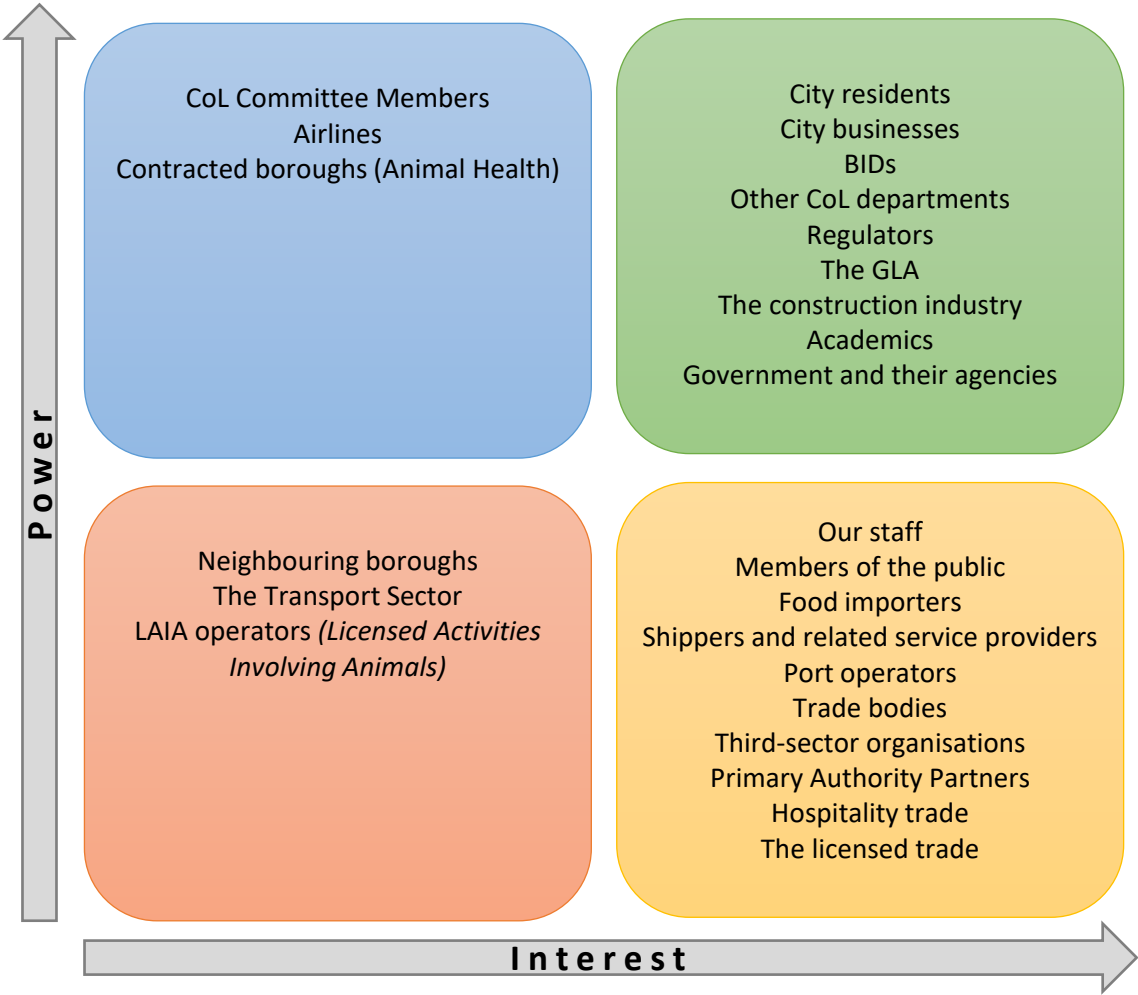
The Environment Department’s 850 staff are based across 25 sites throughout London and the south-east. We hold approximately 400 physical assets, almost 300 of which are at our Natural Environment sites.

As part of the Corporation’s Operational Property Review Programme, the Environment Department is undertaking a critical review of all its physical assets, including operational property. A Departmental ‘Task and Finish’ group will be established early in 2023/24 to undertake this project. The initial stage of the project will be to identify the resources required to undertake a full analysis and in-depth review of all physical assets held by the department, including baselining operational requirements, financial position and state of repair.

Following this, we will work with the City Surveyor’s Department to establish a detailed project plan and realistic timeline. An update on the status of the assets relevant to this Committee will be reported, including any that are identified as surplus to requirements.

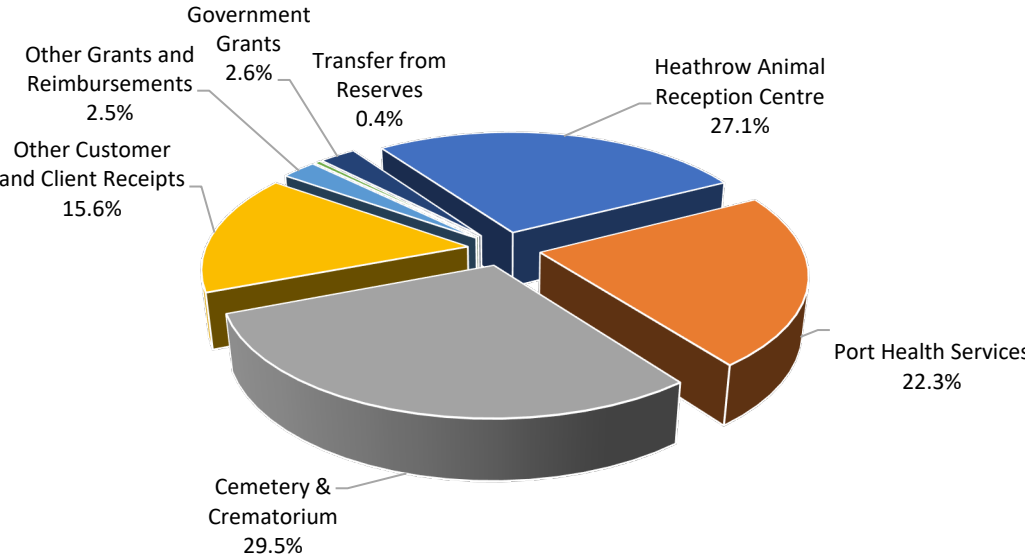
Stakeholder engagement

We have a wide range of stakeholders and delivery partners (including, but not limited to the key ones listed here) and will ensure we continue to communicate with them appropriately.

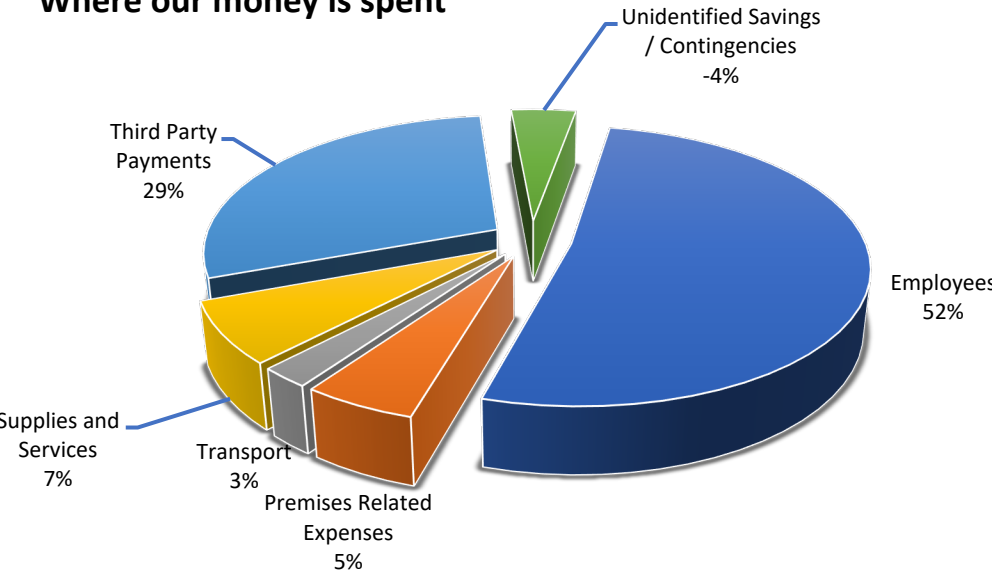


Our financial information

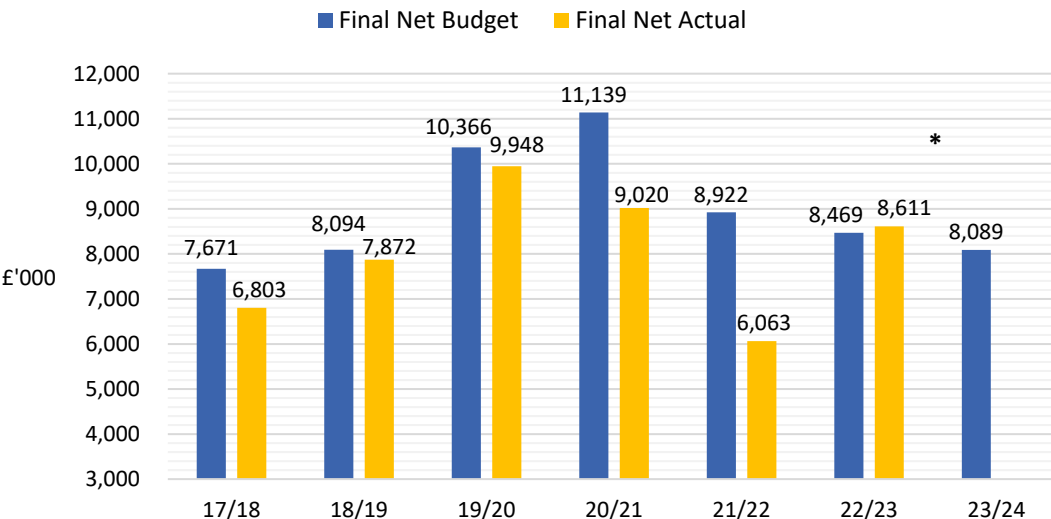
Where our money comes from



Where our money is spent



Budget vs Actual Local and Central Risk Expenditure and Income



*2022/23 'Actual' based on forecast

Capital Projects - 2023/24

Financial year	Priority list (Include any known changes you are preparing for, e.g. new legislation, services, projects, automation)	Funded or Unfunded
2023/24	Replacement of the Launch 'Lady Aileen' Engines (Capital Project).	Funded (from reserve fund)
2023/24	Replacement Excavator for the Cemetery & Crematorium (Capital Project).	Funded (from reserve fund)

Our people*

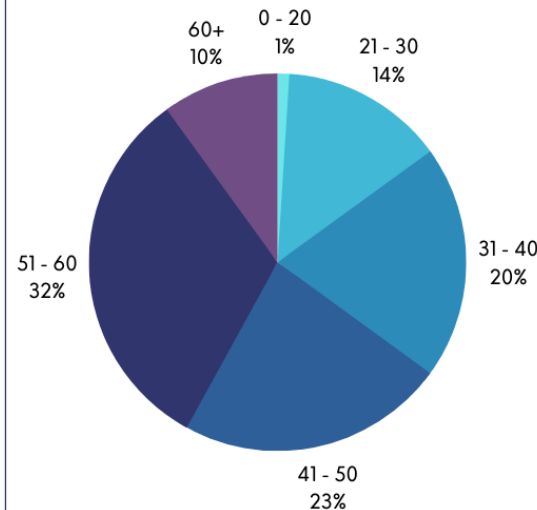
As a new department Equality, Diversity and Inclusion will be a key piece of work, and will include:

- Undertaking an audit on EDI across the new department
- Increased training and development for staff
- Encouraging staff to complete 'sensitive' HR information
- Looking at recruitment practices to expand staff diversity
- Encouraging staff to join and participate in staff networks

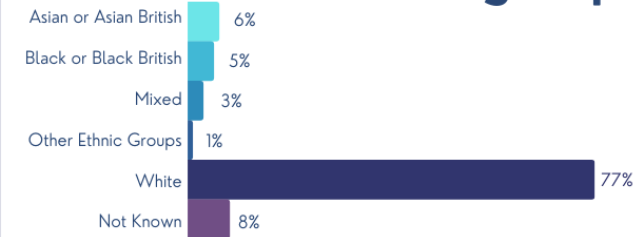
Gender



Age range



Ethnic group



*N.B. The information on this page relates to the whole of the Environment Department, not just to the services covered by the rest of this Business Plan.
All data correct at time of most recent staff survey.

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Committee(s): Port Health & Environmental Services Committee	Dated: 30 May 2023
Subject: Business Plans 2022/23: Progress Report (Period 3, December 2022 – March 2023)	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	1, 2, 5, 6, 8, 11, 12
Does this proposal require extra revenue and/or capital spending?	No
Report of: Juliemma McLoughlin, Executive Director, Environment	For Information
Report authors: Joanne Hill, Environment Department	

Summary

This report provides an update on progress made during Period Three (December – March) 2022/23 against the High-Level Business Plan 2022/23 for the following service areas of the Environment Department which fall within the remit of your Committee:

- The Cleansing Service
- The Port Health and Public Protection Division

Financial information relating to this period will be provided in the separate Chamberlain's Revenue Outturn report which will be presented to your Committee in July 2023.

Recommendation(s)

Members are asked to:

- Note the content of this report and its appendices.

Main Report

Background

1. Your Committee is responsible for the following service areas of the Environment Department:
 - The Cleansing Service
 - The Port Health and Public Protection Division
2. The 2022/23 High-Level Business Plan of each service area was approved by your Committee in January 2022. The plans set out the key aims, workstreams and key performance indicators (KPIs) for the year ahead.

3. To ensure your Committee is kept informed, progress made against the High-Level Business Plans is reported to you on a periodic (four-monthly) basis. This approach allows Members to ask questions and have a timely input into areas of particular importance to them.
4. Please note that the full, end of year financial position will be detailed in the separate Chamberlain's Revenue Outturn report to be presented to your Committee in July 2023.

Cleansing Service

5. Appendix 1 contains an update on the Cleansing Service's performance during Period Three. Headline performance information is provided as infographics.
6. During Period 3 (December 22 to March 23) of this Business Plan, the Management Team continued to monitor the 12 Key Performance Indicators (KPIs) relevant to the performance of the Waste Collection and Street Cleansing contract. These KPIs will be reported separately to this committee on an annual basis. There are no significant issues.
7. Performance against the other departmental KPIs has been positive:
 - a) NI191 (the amount of residual domestic waste per household) has performed well against target (113.04kg per household against a target of 125kg per household).
 - b) NI192 (percentage of domestic waste recycled) has missed the target for the period at 29.10% against a target of 32%. In accordance with the Mayor of London's Environment Strategy an updated Reduction and Recycling Plan has been produced for 2023-25.
 - c) Our NI195 KPI (measuring the amount of land with unacceptable level of litter, detritus, fly tipping and graffiti), which is independently monitored by Keep Britain Tidy, achieved the revised target when measured in February 2023, with all elements of the survey meeting the required standards of cleanliness. The City's overall score of 1.79% against a target of 5% for all areas compares well to previous years.
 - d) The indicator relating to the fleet carbon emissions is being developed. We are in the process of capturing a full dataset to establish the new baseline figures and set targets.
 - e) The attended Public Convenience facilities at Tower Hill and Paternoster, which serve the main tourist attractions, continued to see lower usage than the same period in pre-pandemic years. However, usage is increasing is

significantly higher than the same period last year and we anticipate this trend will continue into the summer.

- f) Contactless payment point options have been installed in all public conveniences. A survey of users' preferred payment methods was carried out over one week in March at Tower Hill, with 77% expressing a preference for contactless payments, and 23% preferring cash. This feedback will help inform any future decisions regarding changes to the payment turnstiles.
- g) The Community Toilet Scheme membership has been reviewed to ensure all current members are up to date and aware of their commitments under the Scheme. Officers have mapped the availability of toilets in the City during different times of the day and this data is being used by officers to target areas for recruiting new members to fill any gaps. Four new members were added during this period bringing the total to 72.
- h) Following a rigorous inspection, we have maintained our Gold Standard accreditation with the Transport for London Fleet Operator Recognition Scheme (FORS) which acknowledges excellence in all aspects of safety, fuel efficiency, economical operations, and vehicle emissions.
- i) Glow-in-the-dark anti-urination posters warning offenders of the risk of receiving fixed penalty notice for public urination have been installed at hot-spots for this behaviour across the City to deter anti-social behaviour.
- j) During this period the Street Environment Officers have issued 347 Fixed Penalty Notices in relation to environmental crime such as littering, public urination, and failure to comply with commercial waste disposal regulations. The team have also reported 513 dockless bikes to be removed from dangerous and unauthorised locations between January and March 2023.
- k) A trial of ten "Ballot Butt Bins" trial has begun along the Riverwalk between Southwark Bridge and London Bridge. These brightly visible orange bins enable smokers to "vote" with their cigarette butt on a fun selection of yes/no, either/or questions. This trial is in partnership with Keep Britain Tidy and is part of a range of different work being carried out with the City to research smokers littering habits.
- l) The most successfully attended Give and Take day was held at the Barbican in January, with over 150 people queueing to come in. This event also hosted a Tech Takeback table where data bearing devices can be safely erased before being reused or recycled. Two more of these events were run as part of London Repair Week in March.

Port Health and Public Protection Division (PH&PP)

8. Appendix 2 contains an update on the Port Health and Public Protection Division's performance during Period Three. Headline performance information is provided as infographics. This is followed by detailed KPI results.
9. Updates on progress against key workstreams and other achievements during the period are summarised below:

a) Air Quality

During period three, the Air Quality Team:

- Hosted a lecture and networking event at the Guildhall to mark the 70th Anniversary of the Great Smog.
- Set up detailed air quality monitoring around St Martin's Le Grand to assess any changes in air quality associated with proposed changes to the road network.
- Reduced the current risk rating of the Air Quality Corporate Risk due to the ongoing reduction in levels of pollution.
- Undertook vehicle emission testing to assess whether Euro 6/VI emission controls are degrading over time, and for the presence of gross emitting vehicles.

b) Brexit

On 5 April 2023 the Cabinet Office started a consultation process with Port Health Authorities and other stakeholders on a new border control regime. The consultation closed on 19 May 2023. The draft Border Target Operating Model (BTOM) is a high-level plan that outlines the new regime for Sanitary and Phytosanitary (SPS) checks on all food, feed and live animals entering the UK.

The Government propose to implement the model through three major milestones:

- 31 October 2023 - The introduction of health certification on imports of medium risk animal products, plants, plant products and high-risk food and feed of non-animal origin from the EU.
- 31 January 2024 - The introduction of documentary and risk-based identity and physical checks on medium risk animal products, plants, plant products and high-risk food and feed of non-animal origin from the EU. At this point, imports of SPS goods from the rest of the world will fall into line with those from the EU.
- 31 October 2024 - Safety and Security declarations for EU imports will come into force from 31 October 2024. Alongside this, the government will introduce the UK Single Trade Window, which will remove duplication where possible across different pre-arrival datasets.

The Port Health and Public Protection Division continues to engage with government regarding the proposed BTOM. Further details on the BTOM are provided in a separate report for this Committee.

c) **Supporting City businesses**

City Businesses continue to recover and adapt to 'living with Covid' with long term changes to operational business models.

Safer City Partnership initiatives continue and target specific activities. As part of this, the City's Environmental Health Team is offering advice and support to businesses to increase compliance and foster better, more sustainable, working relationships with stakeholders.

The Commercial Environmental Health Team has completed the Food Standards Agency's (FSA) recovery plan and is returning to 'business as usual', undertaking more planned proactive interventions and planning projects for 2023/24. The FSA's new Food Standards and Food Hygiene Delivery models will require changes to service delivery which will be reflected in the Team's 2023/24 Service Plan.

d) **Pollution control**

The two recently appointed Construction Levy Officers will further enhance the Team's work to reduce noise and dust and improve air quality.

Officers continue to consult with the Planning and Development Division to minimise the impact of any new development. In addition, the Deconstruction and Construction Code of Practice is being revised for consultation in spring/summer 2023.

Liaison with colleagues in the Highways Team and with TfL to control street works is ongoing. The project on TfL roads, which is being undertaken jointly with TfL and the City of Westminster, is approaching completion. The processes developed as part of this project will be transferable to all street works, ensuring improved standards of control and providing better information to premises impacted by the works.

e) **Construction Impacts Levy**

The additional resource provided by the two Construction Levy Officers has enabled a greater number of proactive visits to ensure works are undertaken compliantly and that contractors and developers are aware of, and understand, the Code of Practice. The Officers are working collaboratively with colleagues in Chamberlain's Department and the Planning Division's s106 team, with improved financial reporting and prediction being implemented. These developments will ensure better control of construction works and safeguard income.

f) **Cemetery and Crematorium**

The replacement of grave digging equipment, vehicles and plant is now complete with all items purchased using the Cemetery Reserve Fund. Discussions with the City's Energy Team and City Surveyor's Department regarding options for energy generation are ongoing.

Corporate & Strategic Implications

Strategic implications – The monitoring of key improvement objectives and performance measures links to the achievement of the aims and outcomes set out in the Corporate Plan 2018-23.

Financial implications – Financial implications are addressed within this report, with further detail included in the appendices.

Resource implications – None.

Legal implications – None.

Risk implications – Risks to achieving the objectives set out in the Business Plan of each service area are identified and managed in accordance with the City of London Risk Management Framework. Risk Registers are reported to this Committee on a regular basis.

Equalities implications – None.

Climate implications – None.

Security implications – None.

Appendices

Appendix 1 - Cleansing Service, Period 3 2022/23
Key performance information (infographics)

Appendix 2 - Port Health & Public Protection Division, Period 3 2022/23
a) Key performance information (infographics)
b) Progress against Key Performance Indicators

Background Papers

‘Draft High-Level Business Plans 2022/23’ (PH&ES Committee, 18 January 2022)

Contact

Joanne Hill, Business Planning and Compliance Manager, Environment Department
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T: 020 7332 1301

Business Plan 2022/23

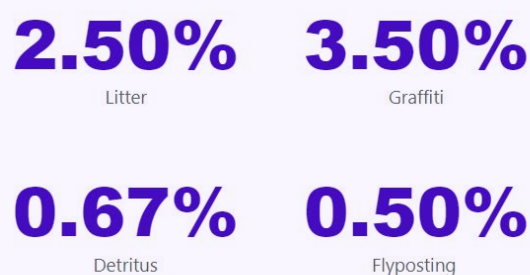
Key performance information

Cleansing Service Period 3: December 22 – March 23

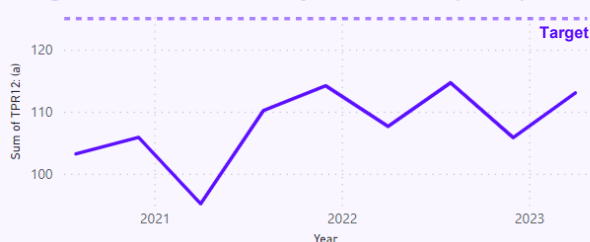
Local Environment Quality - Overall (NI195)



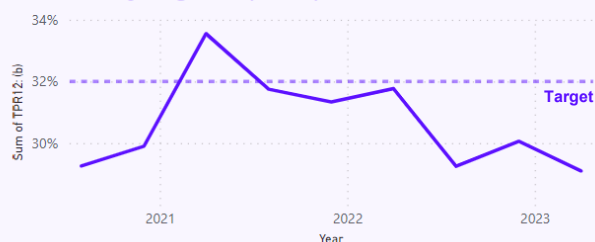
Local Environment Quality - Breakdown (NI195)
Percentage of areas surveyed not reaching acceptable standard



Kilograms of General Waste per Household (NI191)



Overall Recycling Rate (NI192)



Community Toilet Scheme

72
Members

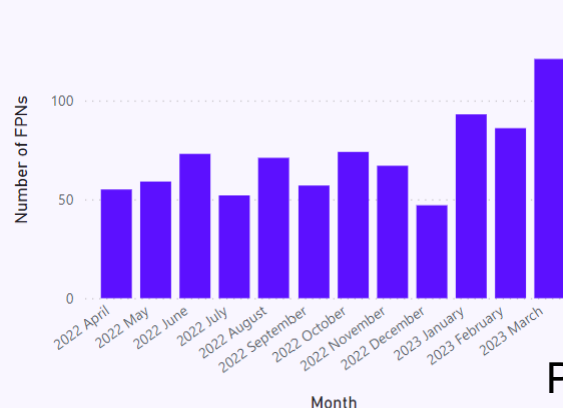
Clean Streets Partnership

252
Members

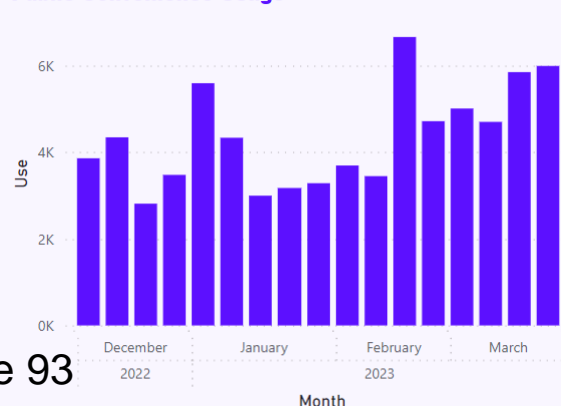
Clean City Awards Scheme

19
Members

Total FPNs Issued



Public Convenience Usage



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Business Plan 2022/23

Key performance information

Period 3: 1 December 2022 - 31 March 2023

Public Protection



137

food hygiene inspections conducted
(2022/23 Total: 615)



3

(2022/23 total: 13)
Number of
prosecutions/legal action in relation to
unlicensed street trading.



786

Trading Standards complaints &
service requests received
(2022/23 total: 2703)

Food Hygiene Rating Scheme: profile of food businesses



Require
improvement
(0-2 rating)

Broadly compliant
(3-5 rating)

2022/23
Year End
Profile

49

(3%)

1568

(97%)



210

noise complaints investigated
(2022/23 total: 724)

Burials

283

(2022/23 total: 829)



Cremations

915

(2022/23 total: 2145)

Port Health

Products of Animal Origin consignment checks

2528

physical checks
(2022/23 total: 7738)

4290

documentary checks
(2022/23 total: 13718)



Products of Non Animal Origin consignment checks

1474

physical checks
(2022/23 total: 5143)

10193

documentary checks
(2022/23 total: 34635)

Animal Health



233

Animal Health inspections
carried out
(2022/23 total: 583)



4539

consignments of animals through
Heathrow Animal Reception Centre
(2022/23 total: 16002)

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Port Health and Public Protection Division
Progress against Key Performance Indicators
Period Three: 1 December 2022 – 31 March 2023 (and full year results)

Performance Measure		Performance 2021-22 (full year result)	Target 2022-23	Performance Period Three 2022-23	Performance 2022-23 (full year result)
Air Quality Percentage of the City's area that meets the health-based Limit Values and WHO Guidelines for nitrogen dioxide levels by 31 March 2023. (Ultimate target is 90% by 31 March 2025).		N/A <i>New measure for 2022/23</i>	90% by 31 March 2025	94% (2021)* ¹	94% (2021)* ¹
Port Health Proportion of imported food and feed consignments that satisfy the checking requirements cleared within five days.	a) Products of Animal Origin: 85% (<i>figures exclude Brazilian products</i>) * ²	76% * ²	85%	90% * ²	87% * ²
	b) High-risk Products of Non-Animal Origin: 93%	96%	85%	96%	94%
Port Health Proportion of imported food and feed consignments (Products of Non-Animal Origin - PNAO) subjected to documentary controls within five days.		94%	85%	92%	94%
Heathrow Animal Reception Centre Percentage of missed flights for transit of animals caused by the Heathrow Animal Reception Centre.		0%	<1%	0%	<1%
Trading Standards Respond to 100% of victims of investment fraud identified to the Trading Standards Service within five working days to advise on the risk of repeat targeting, assess the need for safeguarding interventions and initiate the safeguarding process where appropriate.		100%	100%	100%	100%
Pollution Control * ³ 90% of justifiable noise complaints investigated result in a satisfactory outcome.		99%	90%	99%	100%

Performance Measure	Performance 2021-22 (full year result)	Target 2022-23	Performance Period Three 2022-23	Performance 2022-23 (full year result)
Commercial Environmental Health: Food Safety *4 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 <i>Annual measure</i>	Improved profile	N/A <i>Annual measure</i>	Improved profile
Commercial Environmental Health: Health & Safety Complete the annual risk-based cooling towers inspection programme in order to ensure that the risk of Legionnaires' disease is being effectively managed by all those responsible.	N/A <i>Annual measure</i>	100%	N/A <i>Annual measure</i>	19% *5
Cemetery and Crematorium Number of burials	857	830 (Annual target)	283	829
Cemetery and Crematorium Number of adult cremations	2,460	2,460 (Annual target)	915	2,415
Cemetery and Crematorium Amount of gas used to heat the Modern Crematorium (kWh)	20,726 kWh	21,500 kWh (Annual target)	11,629 kWh	21,650 kWh
Cemetery and Crematorium Energy generation from solar power - electricity in kWh	26,075 kWh	25,750 kWh (Annual target)	7,857 kWh	26,254 kWh
<p>*1 Data on the % area of the Square Mile which meets the NO2 limit value is only made available by calendar year and approximately 10 months in retrospect. The 2021 data has recently been provided and shows 94% - an increase on the 2020 figure of 93%. This increase was expected due to the return of workers to the City during 2021.</p> <p>*2 The requirement for enhanced checks on Brazilian imports continues to impact clearance rates at London Gateway. The results shown exclude Brazilian imports. During Period 3 (December-March) the clearance rate for Brazilian products only was 77% within 5 days.</p> <p>*3 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.</p> <p>*4 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.</p> <p>*5 It was not possible to complete the planned work programme during 2022/23. Officers responsible for Cooling Tower inspections were diverted elsewhere, principally the IDOX Uniform project, further upskilling and shadowing was completed to enhance team resilience and some inspection work was undertaken by a (competent) officer informally seconded from Port Health.</p>				

Committee(s):	Dated:
Port Health and Environmental Services Committee	30/05/2023
Subject: Update on the impact of the Border Target Operating Model on Port Health & Public Protection	Public
Which outcomes in the City Corporation's Corporate Plan does this proposal aim to impact directly?	5, 6, 7
Does this proposal require extra revenue and/or capital spending?	N
If so, how much?	£ N/A
What is the source of Funding?	N/A
Has this Funding Source been agreed with the Chamberlain's Department?	N/A
Report of:	For Information
Juliemma McLoughlin, Executive Director Environment	
Report authors:	
Timothy Bage, Assistant Director - Port Health	
Gavin Stedman, Director Port Health and Public Protection	

Summary

This report provides an update to Members on the current position in respect of the new United Kingdom (UK) regime for checks on imported food, feed and live animals from the European Union (EU) and Rest of World (RoW).

Recommendation(s)

Members are asked to note the report.

Main Report

Background

1. The City of London Corporation is the London Port Health Authority (LPHA) for 94 miles of the tidal Thames, from Teddington lock to the outer estuary. The LPHA covers the ports at London Gateway, Tilbury, Tilbury 2, Purfleet, Thamesport, Sheerness and London City Airport – and over 60 other docks and wharves.

2. The Port Health Service has a statutory responsibility for the inspection of all food and feed that enters the UK through the ports of London, and the Medway. These border controls currently focus on food and feed entering the UK from all countries, except those originating from the EU. However, with the implementation of the provisions relating to the UK's withdrawal from the EU it became necessary to implement Sanitary and Phytosanitary (SPS) checks on good entering the UK from the EU.
3. The City also operates the Heathrow Animal Reception Centre (HARC), which is the Border Control Post for live animals at Heathrow Airport. Checks are also undertaken on pets imported through the airport, under the Pet Passports Travel Scheme. In addition, the service has a statutory duty to enforce animal health and welfare legislation for the importation, welfare and transit of live animals
4. There have been numerous updates to this committee on the implications of leaving the EU on the regulatory landscape in respect of the ports and HARC. Early on the City adopted the Six Key Brexit Principles which would guide officers in their conversations with government, see Appendix 1.
5. The history of the implementation of SPS controls on food, feed and live animals from the EU is punctuated with several false starts since leaving on 31st January 2020, the past committee papers will tell the storey of preparing, resourcing, training staff then regrettably letting them go when checks were delayed.

Imported Food and Feed Regime – Draft Border Target Operating Model

6. On 5 April 2023 the Cabinet Office started a consultation process with Port Health Authorities and other stakeholders on a new border control regime. The consultation closed on 19 May 2023. Appendix 2 is the response made by the Port Health Service to government. The Draft Border Target Operating Model (BTOM) is a high-level plan that outlines the new regime for SPS checks on all food, feed and live animals entering the UK.
7. For SPS controls, the new model contains the following three key elements:
 - **A new global risk-based approach:** live animals, germinal products, products of animal origin, animal by-products, plants and plant products will be categorised as high, medium or low risk, with controls appropriately weighted against the risks posed both by the commodity and the country of origin;
 - **Simplified and digitised health certificates:** digitised phytosanitary certificates from 2023 with take-up depending on our trade partners' readiness.
 - **Use trust:** pilot schemes with industry where authorised importers of plants, plant products and some animal products may be eligible for streamlined controls.

8. The development of the UK Single Trade Window (STW) will underpin this new approach to controls. This will provide a single digital gateway for both importers and exporters to provide the data needed to trade and apply for licences and authorisations for trusted trader schemes.

9. The Government propose to implement the model through three major milestones:

- **31 October 2023** - The introduction of health certification on imports of medium risk animal products, plants, plant products and high-risk food and feed of non-animal origin from the EU.

This change will have limited impact, it is likely that health certificates will be voluntary and check centrally in a hub rather than at PHA level.

- **31 January 2024** - The introduction of documentary and risk-based identity and physical checks on medium risk animal products, plants, plant products and high-risk food and feed of non-animal origin from the EU. At this point, imports of SPS goods from the rest of the world will fall into line with those from the EU.

This is the significant change, where EU and RoW food and feed gain parity, at this point the new model of documentary, identification and physical checks is implemented, and checks will start at all new points of entry in addition to existing points. This is where the resource implications will impact PHAs, importers and other stakeholders.

- **31 October 2024** - Safety and Security declarations for EU imports will come into force from 31 October 2024. Alongside this, the government will introduce the UK Single Trade Window, which will remove duplication where possible across different pre-arrival datasets.








This is likely to have a limited impact, on the proviso that all new ICT systems are ready to link up to the governments new single trade window. We are aware that our software suppliers are in conversation with government on these matters.

10. Under the new regime, controls will be applied to goods proportionately based upon their risk categorisation:

- **High risk** (predominantly live animals, germinal products and goods under safeguard measures) will require pre-notification, simplified health certificates, documentary checks and a higher degree of physical and ID checks.
- **Medium risk** will require pre-notification, simplified health certificates, documentary checks and be subject to risk-based identity and physical checks at the border. Some will be set at 1% physical and identity

checks, although other goods will be considerably higher based on specific risks.

- **Low risk** will have minimal routine border controls applied. The proposal is for there to be no health certification or routine physical border checks, only a pre-notification data set and commercial documentation will be required for all low-risk animal products.

Consignment Risk (Country risk x commodity risk)	Example Animal Products	Health Certificates	Pre-notification requirements	 Indicative checks %			Indicative Checks % Under the current regime
				 Doc	 ID	 Physical	
High Risk	 Live animals and commodities covered under safeguard measures	Export Health Certificate required	Full Pre-notification requirements	100%	100%*	100%*	100% Identify 100% Physical
Medium Risk	 Raw, chilled, frozen meat/ meat products/ dairy; ABP for use in animal feed; medium risk fishery products imported as products of animal origin	Export Health Certificate required	Full Pre-notification requirements	100%	1% - 30%**	1% - 30%**	100% Identity 15-30% Physical
Low Risk	 Processed, shelf-stable products such as composites and canned meat products, processed animal by-products and certain fish products	No Export Health Certificate required	Pre notification data to allow traceability	0%	0%	0%	100% Identity 1-5% Physical

- If risks increase or decrease and commodities need to move between risk categories, traders will be given 3 months' notice so they can adapt their processes as needed, unless urgent protective action is required. The ability to apply emergency control measures on any commodities which pose an imminent risk to human or animal health will be retained.

Accredited Trusted Trader Scheme

- The Accredited Trusted Trader scheme is proposed to be piloted. This scheme would allow frequent importers of products of animal origin and animal by-products to potentially reduce the need for routine physical checks at the Border Control Posts (BCPs) by taking responsibility for carrying out routine checks and sampling to ensure the protection of biosecurity, animal and public health whilst being closely regulated by government.

Implications for London Port Health Authority

- At this stage it is too early to fully understand the implications of the BTOM. Key information and data have not yet been released to allow the Port Health Service to make judgements on future resource requirements.
- The Risk Matrix above requires further details in respect of all EU and RoW Products of Animal Origin (POAO) sub-categorisation. Officers have not had sight of robust detailed EU consignment throughput data from the Cabinet

Office, therefore it is too early to estimate demand for resource from each port operator with an established or new BCP.

15. There is no final confirmation on the charging framework, although at this late stage it is likely to remain a locally charged service, for now. Additionally, it is not yet known if 'capped fees' would be introduced to ensure consistency across all Port Health Authorities (PHAs).
16. Once the new model is fully explained and details are provided, the Port Health Service will be able to reconfigure its service delivery approach to meet the demands of the new model. Early observations are that officers will be conducting greater numbers of documentary checks on consignments, and the numbers of physical examinations will reduce. If pilots of trusted trader schemes are shown to be successful, then these are likely to take some work from PHAs over the medium to long term. The number of staff on establishment is likely to increase to meet demands, but the number and the nature of contracts are not yet known.
17. The Port Health Service is working closely with the Association of Port Health Authorities (APHA) to respond to the consultation, and LPHA has taken a leading role amongst PHAs in organising a well-attended co-ordination workshop on 20 April..
18. The Service's Management Team have divided the Cabinet Office workshops and information sessions between them to ensure that our views are represented and that we have a visible presence for key stakeholders. Officers are also in bi-monthly consultation with the Defra Engagement Team.
19. In addition, the Service have an officer seconded to Defra 3 days per week on a cost recovery basis to help influence and shape the new BTOM. They are a useful sounding board for colleagues in Defra about the practical application of different policy approaches.

Heathrow Animal Reception Centre (HARC)

20. Live Animals will be categorised as high risk under the BTOM. In most cases, live animals will be subject to 100% identity and physical checks. Some exceptions to the requirement for 100% checks are planned for animals such as high- health equines (e.g. race horses) from low-risk countries, some zoological animals and some live aquatic animals.
21. Currently there are temporary controls undertaken at the point of destination for live animals arriving from EU countries. A species-by-species risk analysis will consider whether some checks could continue to be undertaken inland. This might mean they would need additional controls or processes.

22. Further BCPs are expected to come online throughout 2024 and checks on live animals will move to these where required. Officers are in discussion with government about the role of HARC, and how it's role may be expanded to meet the additional needs generated through the imposition of new controls.
23. The latest indications are that adaptations to the live animal controls will not be implemented until late 2024 as there are already processes in place for the movement of live animals.
24. HARC continues to engage with government bodies and stakeholders regarding the future regime for live animals to ensure that animal welfare and health is maintained. Appendix 3 is the response made by HARC to the draft BTOM.

Corporate & Strategic Implications

25. **Strategic implications** – These proposals aim to achieve the following Corporate Plan aims of:
 5. Businesses are trusted and socially and environmentally responsible, and;
 6. We have the world's best legal and regulatory framework and access to global markets.
 7. We are a global hub for innovation in finance and professional services, commerce and culture.
26. **Financial implications** – It is not possible to determine the financial impact of the government's proposals at this stage whilst both the resource implications and charging regime remain uncertain. Although the details of the charging regime are still to be confirmed, it is anticipated that it will allow the service to operate on a full cost recovery basis. Defra have previously provided grant funding for additional staffing and other costs in preparation for checks on EU goods. We expect them to make further grant funding available for PHAs and the Port Health Service will bid for such funding to bridge the gap between the need to staff the implementation of the new model and the income being realised by the Port Health Service.
27. **Resource implications** – Staffing levels and operational cover will need to be considered when the Port Health Service has all of the information to allow decisions to be made on service provision and resourcing.
28. **Legal implications** – The new model will not remove the requirements for PHAs to control food, feed and live animals at the border, therefore failure to provide the service would have reputational implications.
29. **Risk implications** – Brexit – Impact on Port Health and Animal Health is a red risk for the Department. This position will be maintained until full details of the new border regime and its impacts are determined.

30. **Equalities implications** – None identified following a test of relevance.

31. **Climate implications** – None

32. **Security implications** – None

Conclusion

33. The release of the BTOM is welcome progress however additional information is required before the full implications of the new border operating model is fully understood. Further reports will be presented to this Committee when the implications are known.

34. The Port Health & Public Protection Division continues to have dialogue with government and its agencies, and other stakeholders to ensure that the City of London remains abreast of developments, promotes the City of London Corporations Six Key Brexit Principles, and continues to lead and shape the narrative around an effective, efficient and safe UK border operating model, that protects public, animal and environmental health.

Appendices

Appendix 1: City Corporation - Six Key Brexit Principles

Appendix 2: Port Health's response to the BTOM consultation

Appendix 3: HARC's response to the BTOM consultation.

Background Papers

- Impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to Port Health & Environmental Services Committee, 19 September 2017.
- Update on the impact of the UK leaving the EU (Brexit) on Port Health & Public Protection – report to Port Health & Environmental Services Committees 2016 – 2022.
 - 6 March 2018
 - 16 July 2018
 - 27 November 2018
 - 24 September 2019
 - 26 November 2019
 - 3 March 2020
 - 21 July 2020
 - 22 September 2020
 - 24 November 2020
 - 20 January 2021
 - 16 March 2021

- 18 May 2021
- 13 Jul 2021
- 27 September 2021
- 23 November 2021

- 18 January 2022
- 22 July 2022
- 10 October 2022
- 29th November 2022

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Appendix 1: City Corporation - Six Key Brexit Principles

The City Corporation has agreed and is promoting the following principles in relation to biosecurity and Brexit:

- The same, or an improved, level of consumer protection should be sought for public, animal and environmental health in terms of any proposed changes to regulatory controls after the UK leaves the EU.
- Any changes to the current legislation should be commensurate with the risk posed by different activities and trades, as it is recognised that some enforcement requirements could be streamlined.
- The UK should continue to recognise EU controls in order to avoid resourcing implications at the UK border; and this would **best** be done as part of a reciprocal agreement with mutual recognition, as this would be more sustainable politically, promote regulatory alignment, and facilitate UK-EU trade.
- Full cost recovery for local authorities and port health authorities to enforce relevant legislation is essential, and this should be extended to include those areas not already covered, particularly if they have to undertake additional controls as a result of Brexit.
- The current checks at UK and EU borders on third country imports should be maintained to facilitate free movement of goods within the EU, and between the EU and the UK, and the UK should maintain access to existing IT and rapid alert arrangements.
- To control public health and animal health risks effectively, and to prevent the potential spread of zoonosis, monitoring, checks and controls on high risk food, feed and animals should be undertaken at first point of entry into the UK, i.e. at its borders.

Appendix 2: Port Health - Response to Government on the Draft Border Target Operating Model

Response to be inserted

Appendix 3: HARC - Response to Government on the Draft Border Target Operating Model

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