

# Appendix A: Wholesale Markets Risks

Report Author: Joanne Hill

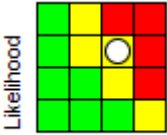
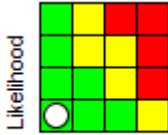
Generated on: 06 May 2021



Risks are grouped by subject

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>MCP-SM 012</b> <b>Building maintenance-management</b>  29-Sep-2020 Jon Avern	<b>Cause:</b> The deterioration of physical assets due to the lack of adequate maintenance. <b>Event:</b> Partial collapse or failure of structure. <b>Effect:</b> Serious harm to building occupiers and members of the public by exposure to various physical hazards. Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc. Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.		<b>16</b>	A full condition survey has now been completed. The report and recommended 10 Year Maintenance Plan will be compiled by 9 April with the final Maintenance Plan presented to the City Surveyor’s Department by 30 April. The scope of works will then be developed in the first week of May with funding approvals sought thereafter before a full programme of works is developed. The target risk date has been amended to September as being a more realistic target date of any urgent works. This will be reviewed again once the surveys are received and works priorities agreed.		<b>1</b>	30-Sep-2021	
							Reduce	

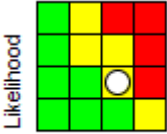
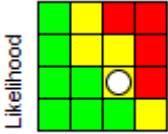
Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-SM 012a	Condition survey to be carried out.	A full condition survey has now been completed. The report and recommended 10 Year Maintenance Plan will be compiled by 9 April with the final Maintenance Plan presented to the City Surveyor's Department by 30 April. The scope of works will then be developed in the first week of May with funding approvals sought thereafter before a full programme of works is developed. The target risk date has been amended to September as being a more realistic target date of any urgent works. This will be reviewed again once the surveys are received and works priorities agreed.	Mark Sherlock	06-May-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-BG 002 <b>Building maintenance-management</b>  29-Sep-2020 Jon Averbs	<p><b>Cause:</b> The deterioration of physical assets due to the lack of adequate maintenance</p> <p><b>Event:</b> Partial collapse or failure of structure.</p> <p><b>Effect:</b> Serious harm to building occupiers and members of the public by exposure to various physical hazards. Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc. Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.</p>	 <p>Likelihood</p> <p>Impact</p>	12	<p>A full condition survey commenced at Billingsgate Market on 29 March and is now complete. The report and recommended 10 Year Maintenance Plan is being prepared and the final Maintenance Plan is due to be presented to City Surveyor's Department by 7 May. The scope of works is due to be agreed by 14 May 2021.</p> <p><b>04 May 2021</b></p>	 <p>Likelihood</p> <p>Impact</p>	1	30-Jun-2021	Constant
							Reduce	

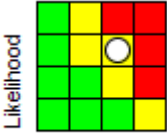
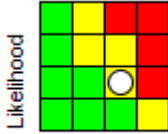

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-BG 002a	Condition survey to be carried out.	The appointed contractor has attended site and we are now awaiting production of the conditions survey report.	Daniel Ritchie	04-May-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-NS 003 <b>Building maintenance-management</b>  29-Sep-2020 Jon Averbs	<b>Cause:</b> The deterioration of physical assets due to the lack of adequate maintenance. <b>Event:</b> Partial collapse or failure of structure. <b>Effect:</b> Serious harm to building occupiers and members of the public by exposure to various physical hazards. Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc. Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.	 Likelihood Impact	12	A full condition survey took place during the week commencing 15 March. The surveyors are due to provide their report and recommended 10 Year Maintenance Plan by 23 April, with the final Maintenance Plan presented to City Surveyor's Department by 14 May. The scope of works is due to be agreed by 21 May 2021.  <b>29 Apr 2021</b>	 Likelihood Impact	1	30-Jun-2021	Constant
							Reduce	

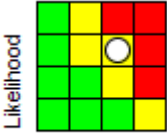
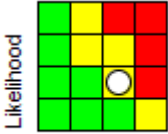

Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
MCP-NS 003a	Condition survey to be carried out.	The appointed contractor carried out the survey on-site during the week commencing 15 March 2021.			Emma Beard; Debbie Howard	29-Apr-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 001 HGV Unloading Operations  24-Feb-2015 Mark Sherlock	<p><b>Cause:</b> A lack of suitable and sufficient training and adequate management controls in relation to Heavy Goods Vehicle banksman activities undertaken by staff employed by Smithfield Market tenants.</p> <p><b>Event:</b> Serious or life changing injury to members of the public, market staff and other service users caused by uncontrolled or unguided reversing vehicles.</p> <p><b>Effect:</b> Realisation of this risk could result in a prosecution, fine and reputational damage for the City.</p>	 <p>Likelihood</p> <p>Impact</p>	8	<p>An HGV audit was carried out from the 21 March for four nights. There was 13% non-compliance across 111 deliveries during the audit. Letters to the deliveries companies have been sent, reiterating site rules, as well as the audit outcome details sent to the SMTA for review and improvement discussion with members at their next council meeting. An improvement audit is planned for early May 2021.</p> <p><b>06 May 2021</b></p>	 <p>Likelihood</p> <p>Impact</p>	8	31-Dec-2021	Constant
							Accept	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-SM 001k	Keep the risk under review.	An HGV audit was carried out from 21 March for four nights. There was 13% non-compliance across 111 deliveries during the audit. Letters to the deliveries companies have been sent, reiterating site rules, as well as the audit outcome details sent to the SMTA for review and improvement discussion with members at their next council meeting. An improvement audit is planned for early May 2021.	Mark Sherlock	06-May-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>MCP-BG 001 Workplace Transport</b>  26-Apr-2017  Daniel Ritchie	<b>Cause:</b> A lack of suitable and sufficient training and adequate management controls in relation vehicle movements at Billingsgate Market. <b>Event:</b> There is a risk of a life changing injury to a pedestrian if vehicle movements including forklift trucks are not appropriately managed and controlled. <b>Effect:</b> An accident involving a pedestrian and a vehicle which resulted in a serious or life changing injury could result in prosecution, a fine, reputational damage for the City.	 Likelihood	<b>12</b>	This risk has been reviewed and is being held at Amber until we have total compliance with our traffic management policies.  <b>04 May 2021</b>	 Likelihood	<b>8</b>	30-Jun-2021	  Constant
							Reduce	

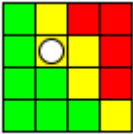
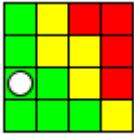

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-BG 001e	Respond to recommendations and agree an action plan.	An action plan has been put in place to deal with the highest risk factors.	Daniel Ritchie	04-May-2021	30-Jun-2021
MCP-BG 001f	Complete actions and record evidence with a view to reducing the risk rating (if appropriate).	Actions are currently being addressed in order of priority.	Daniel Ritchie	04-May-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
<b>MCP-NS 001 Workplace Traffic Management</b>  24-Feb-2015 Emma Beard; Sean Benton; Debbie Howard	<b>Cause:</b> Over 200 forklift trucks operate on the New Spitalfields Market site. <b>Event:</b> There is a serious risk of life changing injury to a pedestrian if vehicle movements in this constrained space are not appropriately managed and controlled. <b>Effect:</b> An accident involving a pedestrian and a vehicle which resulted in a serious or life changing injury could result in prosecution, a fine, reputational damage for the City and have an adverse impact on the operation and sustainability of the service.	 Likelihood Impact	<b>12</b>	This risk is under constant review and work is being carried out to assess whether forklift trucks (FLT's) can be subjected to further restrictions within the Market Hall, such as elimination of use and/or using pedestrian controlled equipment such as hand-drawn pumper trucks.  The entrance/exit barrier is now operational and is supporting the reduction of risk by controlling access to the site. The new system can also be programmed to automatically refuse entry to the vehicles of individuals who have breached site rules.  Implementation of the new pedestrian gate/turnstile has been delayed by technical problems. The IT department is working with the contractor to resolve this issue. Once in operation, this gate will support separation of vehicles and pedestrians.	 Likelihood Impact	<b>8</b>	01-Jul-2021	
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP NS-001m	Risk will be reviewed on a monthly basis.	There have been some software problems identified which have caused a delay to completion. The IT department are working with the contractor to resolve the issues.	Emma Beard;	29-Apr-2021	01-Jul-2021

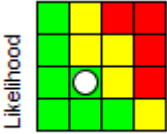
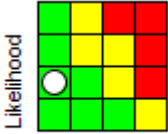
			Debbie Howard		
MCP-NS 001i	A member of staff from all tenants to be nominated and trained in FLT safety procedures.	<p>This action is now complete: a member of staff from each tenant who manages forklift truck drivers has received training.</p> <p>Refresher training must be undertaken every three years. This action will be kept under continuous review to ensure individuals undertake training as it becomes due.</p>	Emma Beard; Sean Benton; Debbie Howard	30-Apr-2021	31-Jul-2021



Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 011 <b>Brexit - impact of Brexit on traders and imports</b>  06-Sep-2019 Mark Sherlock	<b>Cause:</b> The outcome of Brexit negotiations between the UK government and the EU fails to secure continuity of contracts and/or security of supply chains. <b>Event:</b> The market tenants fail to prepare appropriately for the end of the Brexit transition period on 31 December 2020. Uncertainty around the potential outcomes until it is too late to react. <b>Effect:</b> Delays and disruption in the food supply chain, and shortages of product over a prolonged period. There is also a risk, albeit unlikely, that this could impact the financial viability of some tenants' businesses. This in turn could lead to business failures and vacant premises at the markets but given the current position this seems highly unlikely.	 Likelihood	6	<p>Post-Brexit checks on some EU goods coming into Great Britain have been delayed by six months in order to give businesses more time to prepare. The government stated that the new timetable would help firms recovering in the wake of the Covid-19 pandemic.</p> <p>On 11 March 2021, the government announced a new timetable for border checks with full processes for some imports not required until January 2022.</p> <ul style="list-style-type: none"> <li>• Pre-notification requirements for Products of Animal Origin (POAO), certain animal by-products (ABP), and High Risk Food Not of Animal Origin (HRFNAO) will not be required until 1 October 2021.</li> <li>• Full checks and import declarations will now commence in January 2022.</li> </ul> <p><b>06 May 2021</b></p>	 Likelihood	2	31-Jan-2022	
							Reduce	Constant

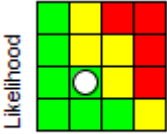
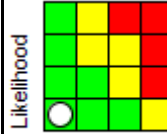
Action no	Action description	Latest Note			Action owner	Latest Note Date	Due Date
MCP-SM 011a	Review the possibility of establishing HGV parking / holding areas in the vicinity of the market to cope with the anticipated increased volume of traffic, including the	A review of bays which are currently suspended due to Museum of London works and the Poultry Market roof project is underway in consultation with the Department of the Built Environment. Eight bays are currently fully suspended which removes the opportunity for 12			Mark Sherlock	04-May-2021	31-Jan-2022

	suspension of some on-street parking bays for this purpose. Other suggestions were West Poultry Avenue, where there is currently a contractors' compound, and Giltspur Street, which is apparently used for parking buses overnight at present.	HGVs to park. The aim is to get some of these reviewed and, where at all possible, returned to Market use.			
MCP-SM 011b	Reschedule working hours for market staff to cover possible extended trading hours.	The recent annual leave moratorium that was in place for staff, has now been reviewed and cancelled, due to no impact on Market operations. All staff have been made aware and encouraged to use any remaining leave. Staffing levels and flexibility will be reviewed prior to the pending full import checks and resource plans amended depending upon advance impact information advised through CoL Brexit briefing groups or trader feedback.	Mark Sherlock	04-May-2021	31-Jan-2022
MCP-SM 011c	Extend parking permissible on-street parking periods. Be prepared to be flexible in response to demand possibly up to 1pm each day.	A review of the extension of the enforcement hours for on-street parking is in progress with the Department of the Built Environment. Markets Committee approved the principal of concessionary parking during Market hours on a needs necessitates basis under delegated authority between the Superintendent and the Chairman for January only. However, due to the last minute trade deal between the UK and EU, the anticipated congestion around the Market did not materialise and the concession was not required.	Mark Sherlock	06-May-2021	31-Jan-2022
MCP-SM 011d	Open Charterhouse Street and Long Lane to two-way traffic.	Long Lane is now two-way from the junction of Lindsey Street. The Department of the Built Environment has declined the Superintendent's request for an additional access route to the Market via Giltspur Street.	Mark Sherlock	04-May-2021	31-Jan-2022

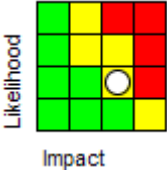
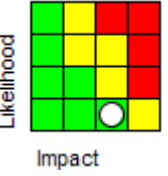
Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-NS 004 Brexit - impact of Brexit on tenants  23-Dec-2020 Emma Beard; Debbie Howard	<p><b>Cause:</b> The outcome of Brexit negotiations between the UK government and the EU fails to secure continuity of contracts and/or security of supply chains.</p> <p><b>Event:</b> The market tenants fail to prepare appropriately for the end of the Brexit transition period on 31 December 2020. Uncertainty around the potential outcomes until it is too late to react.</p> <p><b>Effect:</b> Delays and disruption in the food supply chain, and shortages of product over a prolonged period. There is also a risk, albeit unlikely, that this could impact the financial viability of some tenants' businesses. This in turn could lead to business failures and vacant premises at the markets but given the current position this seems highly unlikely.</p>	 <p>Likelihood</p> <p>Impact</p>	4	<p>The outcome of the trade agreement between the UK government and the EU had a minor adverse effect on the supply chain of goods into the market. However, normal deliveries have since resumed. Implementation of the new border checks has now been delayed. Currently there appears to have been no visible effect on trade.</p> <p>The availability of parking for delivery vehicles and waiting times for unloading may cause disruption to parking and unloading operations. These operations are being reviewed as part of the HGV management plan.</p> <p>The potential impact of the risk has been reassessed and is now rated as 'severe' rather than 'extreme', reducing the current risk score to 4.</p> <p><b>30 Apr 2021</b></p>	 <p>Likelihood</p> <p>Impact</p>	2	01-Jan-2022	↓
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-NS-004a	Review HGV parking/ unloading areas to provide additional spaces for the anticipated increased numbers of vehicles on site. These numbers may cause traffic management issues if arriving en masse, so a contingency plan for additional unloading areas will be developed.	The HGV area at the rear of the market hall has been enlarged and further areas at the sides of the market hall are being considered. This remains under review as part of the Traffic Management Plan.	Debbie Howard	29-Apr-2021	01-Jan-2022

MCP-NS-004b	Consult with the SpMTA to agree parking charges.	Consultation with SpMTA is ongoing.	Debbie Howard	29-Apr-2021	01-Jan-2022
MCP-NS-004c	Consult with the SpMTA on the potential impact of the new import rules which are due to be fully implemented from 1 July 2021.	It is highly unlikely that any tenant has been adversely affected by Brexit to date. Consultation with the SpMTA will continue until the impact, if any, of the new import rules on market tenants becomes clearer.	Debbie Howard	29-Apr-2021	01-Jan-2022
MCP-NS-004d	Identify additional areas on the market site for the storage of produce.	Work has commenced to identify suitable areas for additional storage of produce and 'click and collect', as this has now been identified as a necessary requirement by some tenants.	Debbie Howard	29-Apr-2021	01-Jan-2022

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-BG 003 Brexit - Impact  04-May-2021	<p><b>Cause:</b> The outcome of Brexit negotiations between UK Government and EU fails to secure continuity of contracts and/or security of supply chains.</p> <p><b>Event:</b> Market tenants fail to prepare appropriately.</p> <p><b>Impact:</b> Delays and disruption in the food supply chain create shortages of product over a sustained period placing businesses under threat of viability, with small risk of failure and vacant market premises.</p>	 <p>Likelihood</p> <p>Impact</p>	4	<p>Currently consulting with LFMA, tenants and industry bodies on the impact of the new import and export rules to ensure business preparedness. Progress being kept under constant review.</p> <p><b>04 May 2021</b></p>	 <p>Likelihood</p> <p>Impact</p>	1	30-Jun-2021	Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-BG 003A	Consult with LFMA, tenants and industry bodies on impact of the new import and export rules to ensure business preparedness.	This is being kept under review.		04-May-2021	30-Jun-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-WM 001 Wholesale Markets Consolidation Project  17-Mar-2020 Jon Aaverns	<p><b>Cause:</b> The City of London Corporation is unable or decides not to complete the markets consolidation project or, determines an alternative use for proposed location on the Barking site</p> <p><b>Event:</b> The City's three wholesale food markets, New Spitalfields, Smithfield and Billingsgate are unable relocate to the Barking site.</p> <p><b>Effect:</b> This could result in the following:            Tenant claims against City of London Corporation for loss of earnings and other incurred costs.            Continuing losses from market operations affecting departmental budget.            Relationships with tenants being adversely affected resulting in adverse publicity and possibly leading to reputational damage to the City.            Markets begin to decline possibly to the point where they are irrecoverable.</p>		8	Site survey work for all three market sites is complete and surveyors are currently undertaking the write-ups. The City Surveyor's Department is expecting to receive the survey reports by mid-May.  <b>04 May 2021</b>		4	31-Dec-2026	Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-WM 001a	Keep risk under regular review	This risk will be reviewed and updated on a quarterly basis until such a time that more frequent reviews are required.	Jon Aaverns	04-May-2021	31-Dec-2026
MCP-WM 001b	Agree and implement a maintenance strategy to ensure there are appropriate levels of maintenance such that the markets will not be forced to close due to failing infrastructure.	A maintenance strategy has been agreed to ensure that appropriate levels of maintenance continue to be carried out until there is more certainty about the markets' move. This will cover the risk that the markets cannot operate due to failing infrastructure. Conditions surveys have been completed. Survey reports are expected mid-May.	Jon Aaverns	04-May-2021	31-Dec-2026

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 013 EPA Canopy Failure  17-Aug-2020 Mark Sherlock	<p><b>Cause:</b> Lack of condition survey and maintenance.</p> <p><b>Event:</b> Sections of concrete canopy fail and collapse following extreme weather.</p> <p><b>Effect:</b> Serious harm to building occupiers and members of the public by exposure to various physical hazards. Loss of use of physical assets through accident investigations and enforcement authority prohibitions, etc. Financial losses through potential Health and Safety Executive (HSE) fees for intervention, prosecution, civil claims and reputational damage to the City.</p>	<p>Likelihood</p> <p>Impact</p>	4	<p>All safety and maintenance work has been completed in order to reopen East Poultry Ave and commence safe trading. Further rectification work will be identified by a wider condition survey. When we have sight of the initial findings of the wider condition surveys it is intended that any further work will be carried out as quickly as possible, noting the listed façade.</p> <p>Keltbray attended site on 22 April and made additional safety improvements to the West Market west elevation façade following minor debris movement earlier that morning.</p> <p><b>06 May 2021</b></p>	<p>Likelihood</p> <p>Impact</p>	2	31-Oct-2021	Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP -SM 013a	Survey and review all existing canopies in East Poultry and West Poultry Avenue. Erect crash mats and support props to secure remaining structure.	<p>All safety and maintenance work has been completed in order to reopen East Poultry Ave and commence safe trading. Further rectification work will be identified by a wider condition survey. When we have sight of the initial findings of the wider condition surveys it is intended that any further work will be carried out as quickly as possible, noting the listed façade.</p> <p>Keltbray attended site on 22 April and made additional safety improvements to the West Market west elevation façade following minor debris movement earlier that morning.</p>	Mark Sherlock	06-May-2021	31-Oct-2021

Risk no, title, creation date, owner	Risk Description (Cause, Event, Impact)	Current Risk Rating & Score		Risk Update and date of update	Target Risk Rating & Score		Target Date/Risk Approach	Current Risk score change indicator
MCP-SM 014 Glass Canopy Failure  07-Oct-2020	<b>Cause:</b> Spontaneous failure of overhead glazing panel. <b>Event:</b> Failure of the toughened glass overhead canopy panel/s. <b>Effect:</b> Lacerations, fractures and/or impact injuries to pedestrians who may be showered with glass fragments.	 Likelihood Impact	4	All remedial work on the SW Elevation is now complete and all scaffolding and netting has been removed. Pavements and loading bays are back in operation.  Work scope and quotations are still in progress and additional repairs will be in identified in phases, with any immediate health and safety concerns taking priority.  <b>06 May 2021</b>	 Likelihood Impact	1	30-Jun-2021	 Constant
							Reduce	

Action no	Action description	Latest Note	Action owner	Latest Note Date	Due Date
MCP-SM 014a	Condition survey to be carried out and mitigation plans agreed for safe return of glass canopy to operational uses.	All remedial work on the SW Elevation is now complete and all scaffolding and netting has been removed. Pavements and loading bays are back in operation.  Work scope and quotations are still in progress and any additional repairs will be in identified in phases, with any health and safety concerns taking priority.	Mark Sherlock	06-May-2021	31-Oct-2021