CITY OF LONDON CORPORATION DEPARTMENT OF MARKETS & CONSUMER PROTECTION PORT HEALTH & PUBLIC PROTECTION SERVICE LONDON PORT HEALTH AUTHORITY FOOD SAFETY ENFORCEMENT PLAN 2014-15



Introduction

The Common Council of the City of London Corporation is the Port Health Authority for the district of the Port of London. The jurisdiction is set out in the London Port Health Authority Order 1965 and covers all of the tidal Thames from Teddington Lock to the outer Estuary.

Official food controls are delivered by the Port Health Service which is part of the Port Health & Public Protection Service (PH&PP); which is itself part of the Department of Markets & Consumer Protection (M&CP). This Plan covers the work of the Port Health Service

The checking of imported food and animal feed is an important obligation on the Port Health Service to protect public and animal health. As the checks take place at ports that are first point of entry into the European Union (EU), the Service is responsible for compliance checks for all food and feed imports from outside the EU.

Service Aims and Objectives

Through this plan, the London Port Health Authority 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 the public, environmental, and animal health throughout the London Port Health district

This links to the Key Service Objectives set out in M&CP and London Port Health Service Business Plans.

The Corporate Plan¹ is the City of London Corporation's main strategic planning document providing a framework for the delivery of all services with three strategic aims. The City of London Corporation will support and promote the City of London as the world leader in international finance and business services, and will maintain high quality, accessible and responsive services benefiting its communities, neighbours, London and the nation.

The City of London outlines key plans for the future in a number of strategies according to the different areas of the City's work. These plans and strategies can be viewed on our website's sections on Corporate Governance and performance².

This plan is linked to these strategies through the M&CP Business Plan and our own more specific Port Health Business Plan which should be read in conjunction with this Plan.

Our main goal is to ensure that the Service is meeting its statutory obligations in relation to imported food and animal feed control. In doing this we aim to promote consumer confidence as a result of our work to assure the safety of the food supply chain.

Whilst meeting our statutory obligations we also have to pay attention to the principles of Better Regulation and take into account the way we deliver and enforce the legislation that we are responsible for. We have developed good working relationships with the trade using our ports by trying to understand the risks affecting businesses and dealing with consignments efficiently so as to avoid delays because of the checks we are obliged to carry out.

This understanding is an important aspect of our Service; however, there is a need to strike a balance between support for businesses, especially smaller businesses, and protecting consumers and others from fraudulent and illegal practices.

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 FSA and in accordance with their "Food Law Enforcement Service Planning Guidance" and the content of the Plan provides the basis upon which the London Port Health Authority will be monitored and audited by the FSA.

¹ The Corporate Plan 2013-2017

² The City Corporation's Corporate Governance and Performance

Profile of the Port Health Authority

London Port Health Authority (LPHA) is responsible for a district, which extends for 94 miles (150 kilometres) along the tidal Thames from Teddington Lock to the outer Estuary. It includes the lower reaches of the River Medway, while to the north it encompasses the River Roach and southern part of the River Crouch.

The area for which LPHA is responsible includes the new London Gateway port as well as the ports of Tilbury, Thamesport and Sheerness. The areas also includes London City Airport as well as the various docks and dockland areas which have now been redeveloped

The Port of London is the largest mixed cargo port in the United Kingdom. During 2013 it handled 43.2 million tonnes of cargo. The overall tonnage was lower than in 2012, mainly because of the closure of Coryton Refinery; however, there were increases in volumes of other cargoes including aggregates, vehicles and unitised cargo (containers and trailers).

In addition, Ports on the Lower Medway handle around 2 million tonnes of general cargo including some fruit.

The Port of Thamesport has suffered a serious decline in trade due to the withdrawal of the last remaining significant shipping line calling at the port. This has necessitated the closure of the Thamesport Port Health office.

The main activity for LPHA is the checking of food imports from countries outside the European Union. Cargo arrives from many areas of the world including South America, Africa, Australia, New Zealand, India, the Far East, the Mediterranean, USA, and Canada.

Around 120 000 consignments of food arrived at the ports of Tilbury and Thamesport during 2013. Approximately 110 200 of these were Products Not of Animal Origin (NAO) with remaining 9,800 being Products of Animal Origin (PoAO).

The overall numbers of imported food consignments compared to the previous year have declined because of the reduction in trade through Thamesport. Also there is a continuing trend of a decline in the number of PoAO consignments.

Looking forward, predictions indicate there will be growth in global container shipping; the London Gateway Port is positioned to take advantage of this opportunity and opened as planned in October 2013.

In addition to its imported food responsibilities, LPHA also has responsibility for Animal Feeding Stuffs, Shellfish Classification, Infectious Disease Control, Pollution Control and Pest Control.

Shellfish classification forms the main element of the work carried out by the Launch Service as there are 14 shellfish beds within the Authority's area and five beds monitored on a contractual basis for Swale Borough Council.

Infectious disease control and drinking water quality monitoring are also significant parts of the work undertaken by the Authority, in the Dock areas, on the River and at London City Airport.

Organisational Structure

The current Organisational structure is shown in Attachment 1.

Scope of the Food and Animal Feed Service

London Port Health Authority is responsible for enforcing legal requirements relating to food safety and food standards for all food and animal feed that is imported through the ports within London Port Health Authority area. This includes:

- Operation of the Border Control Posts at London Gateway Port, Tilbury and Thamesport
- Monitoring for illegal food or animal feed imports at other ports within the district
- Carrying out documentary, identity and physical checks on imported consignments of products of animal origin and products not of animal origin
- Making checks of fish catch certificates to ensure compliance with regulations concerning Illegal, Unreported and Unregulated Fishing
- Sampling food and animal feed for chemical analysis and microbiological examination
- Checking consignments of imported animal feed comply with the relevant legislation
- Controls relating to Food Contact Materials
- Enforcing Contaminants in Food legislation
- Verification of Organic Produce
- Control of infectious diseases and food poisoning in liaison with Public Health England
- Control of shellfish harvesting areas including sampling for classification and biotoxin analysis
- Sampling of drinking water supplied to vessels and from fixed points within the port boundary

• Food safety and hygiene inspections of premises and craft at dock locations

Other responsibilities that are delivered alongside the food service include:

- Enforcement of Rabies prevention legislation.
- Carrying out the duties as Regulator under the Environmental Permitting Regulations for Part A2 and Part B Processes.
- Controlling statutory nuisances including the investigation of complaints with regard to noise and odour emissions from certain port industries.
- Monitoring of waste control procedures relating to International Catering waste
- Inspection of vessels under the International Health Regulations and UK health legislation
- Liaison with Government Departments and Agencies
- Co-operate with Port Health Authorities nationally and internationally to maintain and improve service delivery
- Participating at Technical Committees relevant to Port Health.

These duties are carried out by London Port Health employees, external contractors are not used.

Demands on the Service

A review of the Service was carried out during 2013, principally to make recommendations having regard to the opening of the London Gateway port in November 2013, however, there was a serious decline in trade at Thamesport and it became necessary to close the Thamesport office, this entailed redundancies with the remaining staff relocating to Tilbury.

The main objective for the coming year is to consolidate the actions arising from the Port Health review and ensure that sufficient preparations are in place to cope with the increased demand that is likely when London Gateway throughput increases. This is covered in more detail in the Business Plan; staffing and IT development being key issues.

Food Imports may still take place at Thamesport and Sheerness as they have retained official approvals; therefore, it is important to monitor the details to ensure there are no illegal imports. Generally the numbers of imports are very low with staff being sent as required from the Tilbury office to carry out inspections.

The main inspection activity for products of animal origin (PoAO) from countries outside the EU takes place at the Tilbury and London Gateway Border Inspection Posts (BIPs). In addition there are facilities approved as Designated Points of Entry (DPEs)

for non animal products under Regulation 669/2009 for "High Risk" products. Soon these facilities will be collectively known as Border Control Posts (BCPs) under proposed changes to the legislation and London Gateway already refer to their inspection facilities as the BCP.

The hours of operation currently being worked are 07 00 hrs to 19 00 hrs Weekdays, 08 00hrs to 14 00 hrs Saturdays and Sundays. Weekend working is subject to review relating to the potential demand for cover by London Gateway.

Changes in throughput can have a significant effect on the operation of the service as we have experienced at Thamesport. Volumes are predicted to increase as London Gateway attracts more business, particularly once the business park development becomes more established. Failure of the Service to clear cargo swiftly will have a detrimental business effect and tarnish the reputation of London Port Health Authority and by implication, the City of London.

Throughput variations are a considerable challenge because of numerous external factors affecting trade, seasonal variations included. This means that a flexible workforce is required to meet the demand fluctuations.

Changes to legislation places considerable demands on the Service; often the changes can be at short notice to respond to a particular problem. In particular, problems with microbiological contamination, pesticide and veterinary drug residues continue to surface.

Controls implemented at short notice may continue to operate for a long period such as those implemented following the Japan Nuclear reactor incident with checks on food imports for radiation still being in place.

Other emerging risks are notified by the Food Standards Agency, our Public Analysts circulate information as well to assist in determining which products may require our attention. Updates to the "High Risk" list under Regulation (EC) 669/2009 occur every 3 months,

Checks of catch certificates and other documentation under legislation related to the import of illegal, unreported and unregulated (IUU) fishery products is time consuming as a considerable number of consignments have multiple certificates relating to the products being imported. LPHA has good liaison arrangements with the Defra unit responsible for this area of work.

The trade expects consignments to be cleared as quickly as possible as delays result in additional costs and disruption to their business. For this reason our Business Plan includes a performance indicator to measure turn around time. Where containers have to be detained; queries on documentation are processed as quickly as possible; samples are submitted efficiently and there are Service Level Agreements with the laboratories to ensure delays are kept to a minimum.

As part of the Port Health Review, the responsibility for Food Hygiene and Safety inspections on craft and premises operating within the Port Health district has been transferred to the City of London Food Safety Team. A small number of food businesses remain within the docks that require inspection and in house expertise has been retained to carry out this work.

Sampling of imported Products of Animal Origin (PoAO) is carried out in accordance with detailed EU rules and an internal sampling plan related to the physical checks that are undertaken by the Official Veterinarians and Port Health Officers. The aim is to sample between 1 and 10% of all the physical exams carried out linked to a sampling matrix that is produced quarterly anticipating the number of samples required. This is reviewed quarterly in order to make the necessary adjustments in accordance with any throughput variations. Samples taken may contribute to the National Sampling Plan coordinated by the Animal Health and Veterinary Laboratories Agency.

The legislation relating to High Risk non Animal Origin products (NAO) is reviewed on a 3 monthly basis, this can mean changing requirements for sampling. Close liaison with the laboratories is essential because of the potential impact the change will have on them. Insufficient laboratory capacity is a concern which can cause considerable delays to imports.

As the Food Authority for the tidal Thames the Service has responsibility for the harvesting of shellfish throughout its area. A sampling programme is in place for classification purposes and biotoxin monitoring. Sampling for Swale Borough Council is carried out on a contract basis, with any follow up enforcement activity being carried out by Swale Environmental Health officers

London City Airport is within the Port Health boundary and checks are made under the Public Health (Aircraft) Regulations. The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 is in force and has implications for food safety and potable water on board aircraft. Supplies of water at London City airport are regularly sampled and analysed. In addition to the controls on water supplies, regular inspections of the outside catering units and the vehicles delivering the foods for aircrafts are performed.

Our officers board vessels including Cruise Liners arriving within the port to undertake inspections under the Public Health (Ships) Regulations and issue Ship Sanitation Certificates under the International Health Regulations.

The Food Safety (Ships & Aircraft) (England & Scotland) Order 2003 also applies sections of the Food Safety Act to vessels

We work closely with other Port Health Authorities to enforce standards on vessels, in particular to ensure "problematic" vessels are tracked around the UK.

On a regular basis we receive requests from Government officials for visits; a great deal of interest has been shown in the London Gateway Port and we hosted visits for officials from the EU, Defra and the Food Standards Agency. The City Corporation's Town Clerk has visited and we plan to take Members of the Port Health and Environmental Services Committee on a visit in July 2014.

Regulation Policy

arriving in port.

The City Corporation is committed to the principles of the new Regulators' Code³, a statutory code for all regulators. PH&PP has its own <u>Policy Statement on Enforcement</u> which has been approved by the Port Health & Environmental Services Committee and sets out its approach to enforcement.

Interventions

Throughput for imported food consignments for the Period April 2013 to March 2014 is shown in the table below. Some consignments are subjected only to Documentary checks for others, Physical checks are carried out by opening shipping containers at the inspection facility to inspect and take samples of the product for laboratory analysis.

Consignments may be rejected for a wide range of reasons including insufficient or non-existent documentation, inadequate temperature control, insect infestation, contamination with microorganisms, pesticides, mycotoxins or veterinary residues.

In all cases, a rejection notice is served on the importer which may require the destruction, re-export or alternative use of the product. These measures ensure the protection of public and animal health.

³ In force from 6th April 2014

Port Health 2013 -14	Total	Notices Served
Imported food Not of Animal Origin Consignments	120155	N/A
Imported food Not of Animal Origin -document checks	15176	383
Imported food Not of Animal Origin - physical checks	910	0
Number of samples taken	448	0
Products of Animal Origin Consignments	8571	N/A
Products of Animal Origin Consignments – document checks	8571	220
Products of Animal Origin Consignments – physical checks	3620	0
Number of samples taken	372	N/A

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; however, to date no significant complaints regarding imported food or animal feed have been received.

Complaints regarding the actual service provided by LPHA are recorded within the ISO System, an investigation is carried out and remedial action is taken where appropriate; this is followed up at the regular ISO Management Review meetings.

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 relevant import regulations. We also try to identify and contact Primary Authorities following adverse sample results.

We act as the Primary Authority for one company but this relationship requires development and will be reviewed.

Advice to Business

Advice and support to business is in line with the Food Standards Agency Code of Practice. We maintain and build on existing relationships to encourage businesses to meet their legal obligations and to develop best practice.

Detailed information on Port Health Services activities and practical advice on compliance with legislation is available on the City of London website www.cityoflondon.gov.uk/porthealth . The website is regularly updated to include any changes in legislation or procedures.

Where we cannot provide the advice sought, the enquiry will be referred direct to either a dedicated branch of the FSA or Defra.

On a routine basis, information regarding new "controls" is sent direct to importers and agents. Where necessary, individual meetings are also held with agents, importers and other trade organisations to clarify and discuss legal and best practices.

This year we have a Business Plan objective to provide a briefing in relation to the London Gateway Port, we will also give an update on current issues and provide advice and support in the use of electronic systems such as TRACES.

Feed and Food Sampling

All samples are taken in accordance with our Sampling Policy. Details regarding the selection, procurement and preparation of samples are contained in our Sampling Protocol. For more details see www.cityoflondon.gov.uk/porthealth

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 Rapid Alert notifications, Food Standards Agency / Defra intelligence, previous adverse sample results, new products and random sampling.

Products of Animal Origin are checked at the frequencies set by the European Commission for each country of origin.

The latest budget information for sampling is shown in Attachment 2.

The Port Health Service strives to be an active contributor to national and regional sampling programmes and has made a number of successful bids to the Food Standards Agency for funding to support additional sampling of imported food and animal feed.

The majority of our samples for chemical analysis are sent to two Laboratories; Public Analyst Scientific Services (PASS) and Kent Scientific Services (KSS). The City of London has appointed individual Public Analysts employed by these laboratories and the samples are analysed under their supervision. Other accredited laboratories may be used if nominated by the Public Analyst.

Samples for microbiological examination are sent to Public Health England where their Food Examiners are responsible for reporting the result of their examination of the samples.

We have Service Level Agreements in place with the Laboratories to ensure appropriate turn around times depending on the status of the sample.

Control and Investigation of Outbreaks and Food Related Infectious Disease

Port Health Authorities have powers and duties to prevent and control risks to human health from infection or contamination, including by chemicals and radiation.

Masters of vessels or the Commander an aircraft must complete a Maritime or Aircraft Declaration of Health when they are aware of cases of infectious disease or food poisoning and notify the Port Health Authority in advance of their arrival.

The Service has an infectious disease protocol that has been drawn up in conjunction with Public Health England. Close liaison takes place between PHE staff and the Port Health Authority following the protocol to ensure control of the situation. Powers are available to require the ship or aircraft to be isolated from normal traffic and that there is no unauthorised embarkation or disembarkation. This allows an investigation to take place on board the ship or aircraft to identify and diagnose the illness, monitor, review and decide on control measures to contain the outbreak.

In the case of Norovirus or other airborne illness, an enhanced level of scrutiny will be given to the practises, procedures and documentation associated with cleaning and control of infection aboard an aircraft or vessel.

Feed / Food Safety Incidents

We 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 Hazard Warnings receive immediate attention and action where necessary. Out of hours arrangements are in place.

Rapid Alert Notifications issued by the European Commission are sent to a designated Officer who is responsible for their distribution amongst the Officers involved in Imported Food Enforcement. These reports are used to determine if products subject to the Notification are likely to be imported, allowing future imports to be targeted or controlled at the point of entry; effectively ensuring affected products do not enter the UK. The PHILIS system can be used to issue reminders when specific products are subject to control.

Liaison with Other Organisations

We have contact with a number of national organisations in an attempt to ensure consistency and remain at the cutting edge of developments within food and animal health. The organisations include:

HM Revenue and Customs including UK Border Agency [UKBA] and Border Force

Food Standards Agency [FSA]

Department for the Environment and Rural Affairs [Defra]

Animal Health and Veterinary Medicines Agency [AHVLA]

Veterinary Medicines Directorate [VMD]

Rural Payments Agency

The Forestry Commission-Plant Health Service

The Department of Health [DoH]

Public Health England [PHE]

Chartered Institute of Environmental Health [CIEH]

Environment Agency [EA]

Port of London Authority [PLA]

Medway Ports Authority [MPA]

London City Airport Control Authorities Group

We no longer belong to the Association of Port Health Authorities (APHA) and we have been instrumental in setting up the Major Ports Liaison Group. This involves meetings with PHAs responsible for other major Seaports. Membership includes the PHAs for Felixstowe, Southampton and Liverpool as well as FSA, Defra and AHVLA. This enables matters of strategic and operational significance related to Imported Food Controls to be considered.

We hold regular meetings with our Analytical Laboratories to review the service provided, consider current issues and discuss new developments in analytical techniques.

In addition to the above, London Port Health Authority is a Category 1 Responder under the Civil Contingency Act. The Authority is represented at the Kent Resilience Forum and Essex Resilience Forum. City of London Resilience Team colleagues represent the Authority at the various London Forums..

Regular meetings are held with the port operators responsible for the inspection facilities.

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

An annual stakeholder event is held to update the trade and discuss current issues. This opportunity is taken to promote the use of Information Technology to speed clearance times.

Resources Financial Allocation

The overall expenditure in providing the Port Health Service is linked to our Business Plan. Attachment 2 gives the current budgetary information.

Staffing Allocation

Following the Port Health Review a new staffing structure has been put in place. A structure diagram is shown in Attachment 1.

Staff Development Plan

Staff development is managed through the City of London Performance and Development Framework appraisal scheme and is linked to the corporate learning and development strategy which includes Investors in People principles

Following the Port Health Review we are involving staff at lower grades in the inspection duties under professional supervision, the development needs of these staff members has been recognised and a training programme has been implemented.

The former Local Better Regulation Office (LBRO), now Better Regulation Delivery Office (BRDO) Regulators Development Needs Analysis tool is available to inform the individual training needs of staff.

The main targets for training are on the delivery of this Plan and Business Plan Objectives so that staff competencies are developed that can best achieve this. Value for money is considered and the best results have been achieved by engaging external trainers to deliver specific courses. Training records are kept for all staff.

Quality assessment and internal monitoring

The Port Health Food Inspection Service is accredited under the ISO 9001:2000 quality management system. External Audits of the system are carried out at least once per year by independent auditors from NQA accreditation body. We retain a Consultant to assist with internal audits and advise at Management Review meetings.

Other external Audits are carried out by Defra through the Animal Health and Veterinary Laboratory Agency, they deal with the import procedures and controls for products of animal origin. The FSA cover most other food related activities of the Service.

Routine Audits are also carried out by the Food and Veterinary Office of the European Commission on food and animal feed controls.

Key Performance Indicators are set out in the Port Health Business Plan; there are three performance reviews of the plan each year with the Director of Markets and Consumer Protection. The Assistant Port Health Service Director (APHSD) monitors and reports performance at the ISO Management Review Meetings.

Review against the Service Plan for 2014-15

The closure of the Thamesport office and the opening of the London Gateway Port have had a significant impact on the Service. The recommendations of the Port Health Review are being implemented to make sure that our statutory obligations are being met and high standards are maintained in our Service provision.

The Service Plan is subject to review as part of the Business Plan performance management monitoring arrangements held at 4 monthly intervals as well as ISO Management Review meetings.

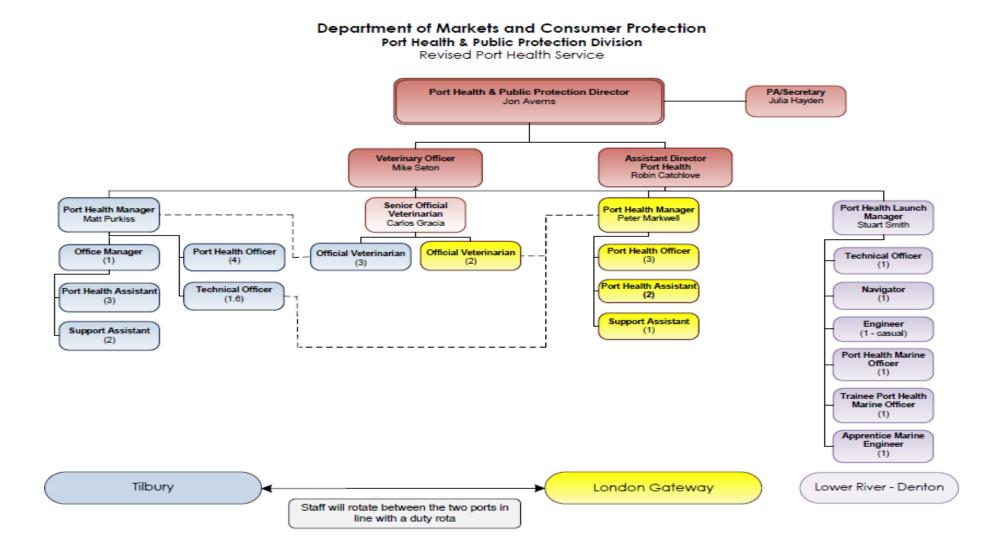
Key Performance Indicators are set out in the Port Health Business Plan; there are three performance reviews of the plan each year with the Director of Markets and Consumer Protection. The APHSD monitors and reports performance at the ISO Management Review Meetings. Where a variation from the Service Plan is identified the reasons for the variation are considered and appropriate actions taken.

Areas of Improvement

A major priority is the development of the use of information technology including the Port Health Interactive Live Information System (PHILIS), this will provide an opportunity to make better use of available resources, and will be essential to deal with the future volumes of imports anticipated at the London Gateway port.

The management review mechanism within the ISO standard also facilitates continuous improvement in accordance with the areas covered by that scheme.

ATTACHMENT ONE - ORGANISATION STRUCTURE DIAGRAM



ATTACHMENT 2 - FINANCIAL RESOURCES PORT HEALTH AND ENVIRONMENTAL SERVICES COMMITTEE - CITY FUND

Actual	PORT AND LAUNCHES Director of Markets and Consumer Protection	Original Budget	Latest Approved Budget	Original Budget
2012-13 £'000		2013-14 £'000	2013-14 £'000	2014-15 £'000
2 000	LOCAL RISK	2 000	2 000	2 000
	Expenditure			
2,083	Direct Employee Expenses	2,011	1,993	1,879
59	Indirect Employee Expenses	50	150	50
2,142	TOTAL Employees	2,061	2,143	1,929
19	Repairs and Maintenance	0	18	0
(4)	Energy Costs	16	6	9
70	Rents	76	73	75
37	Rates	38	41	48
0	Services Charges	0	4	14
0	Water Services	1	1	1
8	Cleaning and Domestic Supplies	0	0	0
0	Grounds Maintenance Costs	2	2	2
130	TOTAL Premises Related Expenses	133	145	149
70	Direct Transport Costs	81	104	85
11	Public Transport	12	11	12
79	Car Allowances	95	85	75
160	TOTAL Transport Related Expenses	188	200	172
20	Continuosat Comitore and Materials	30	44	25
38 1	Equipment, Furniture and Materials Books	0	41 0	25 0
3	Catering	3	3	3
9	Clothes, Uniform and Laundry	14	14	14
8	Printing, Stationery	26	22	22
299	Fees and Services	219	191	188
52	Communications and Computing	63	130	116
8	Expenses	9	9	9
6	Grants and Subscriptions	8	8	8
424	TOTAL Supplies and Services	372	418	385
0	TOTAL Unidentified Savings	(236)	0	0
2.050	TOTAL Expanditure	2 540	2 006	2 625
2,856	TOTAL Expenditure	2,518	2,906	2,635

Actual 2012-13	PORT AND LAUNCHES Director of Markets and Consumer Protection	Original Budget 2013-14	Latest Approved Budget 2013-14	Original Budget 2014-15
£'000		£'000	£'000	£'000
	Income			
0	TOTAL Government Grants	0	(19)	0
(55)	Joint Financing	0	0	0
	TOTAL Other Grants, Reimbursements and	_		
(55)	Contributions	0	0	0
(1,754)	Fees and Charges for Services, Use of Facilities	(1,755)	(1,606)	(1,830)
(1,754)	TOTAL Customer, Client Receipts	(1,755)	(1,606)	(1,830)
0	Transfer from Reserves	0	(399)	0
0	TOTAL Transfer from Reserves	0	(399)	0
(1,809)	TOTAL Income	(1,755)	(2,024)	(1,830)
1,047	LOCAL RISK (excl. City Surveyor)	763	882	805
0	Repairs and Maintenance (City Surveyor)	28	28	28
0	Cleaning (City Surveyor)	10	10	10
0	LOCAL RISK (City Surveyor)	38	38	38
	•			
1,047	TOTAL LOCAL RISK	801	920	843
	RECHARGES			
	Central Recharges			
10	Premises Insurance	10	11	11
11	Transport Insurance	9	9	9
14	Liability Insurance	14	13	12
6	Admin Buildings	8	0	0
241	Support Services	211	260 212	239
195 71	IS Recharge Capital Charges	159 60	59	204 59
548	TOTAL Central Recharges	471	564	534
340		7/1	304	334
(6)	Recharges Within Fund Corporate and Democratic Core - Finance	(6)	0	0
(0)	Recharges Across Funds	(0)		
90	Directorate Recharge - Markets - City's Cash	96	97	99
632	TOTAL RECHARGES	561	661	633
	, · · · · · · · · ·	301		
1,679	TOTAL NET EXPENDITURE	1,362	1,581	1,476