

Professor Brian Bell
Chair of the Migration Advisory Committee (MAC)
Home Office
2 Marsham Street
London SW1P 4DF

22 February 2024

Dear Professor Bell,

Shortage Occupation/Immigration Salary List – Rapid Review Input

Scotland Food & Drink and the undersigned industry partners understand that you are conducting a rapid review of the Shortage Occupation List (SOL), which is being redeveloped to become the Immigration Salary List (ISL).

We hope this submission will support your review. Our first, and perhaps most important point, is that we accept last year's SOL review recommendation to remove a salary discount for overseas workers into roles that have a shortage.

Our aim is not to facilitate cheaper labour from overseas but to enable businesses along the food and drink supply chain to find people who are willing and able to fill vacancies in roles that are critical for their ongoing viability. The planned minimum salary threshold of £38,700 for skilled workers from overseas will mean that many vacancies which are necessarily advertised for less, whilst still being at or above the going rate for the role, will remain unfilled.

This is not just our view. As you will know, the UK Government commissioned John Shropshire to conduct an extensive independent review into Labour Shortages in the Food Supply Chain, which was [published](#) in June 2023. It found that the food supply chain faces *unprecedented* challenges, including recruiting talent. One stark conclusion from the review was that “the domestic workforce is not large enough and does not have the required skills to make the English food supply chain self-sufficient in terms of labour supply.” The same situation applies in Scotland. We have not seen a UK Government response to this review.

Red meat sector representatives have described the impact of the planned threshold changes as “the most significant threat we face in 2024” due to a shortage of butchers (5431). Evidence suggests other sectors will be similarly impacted. A 2023 survey into labour shortages in food and drink businesses in Scotland showed that **92%** of respondents across a wide range of sectors are *currently* unable to find or attract enough suitable employees. In some sectors, such as salmon production, the number of people needed is relatively small, but an acute shortage of people is restricting productivity which has an impact on economically fragile rural and coastal areas.

We believe the Immigration Salary List may be the only way to achieve a pragmatic solution to this. We therefore urge you to consider recommending to

the UK Government that they allow food and drink businesses to recruit workers from overseas into skilled roles where the salary offered is *at or above the going rate for the role*, even if less than the new minimum threshold. This should be on a case-by-case basis, where evidence is provided of a shortage. Such evidence might include vacancy rates, recruitment efforts, overtime, productivity/fulfilment issues etc.

We believe it should be manageable to enhance the current sponsor process, (which already requires a business to complete a licence application, pay fees, and demonstrate that it can fulfil sponsorship duties) to include additional assessments for shortages, which perhaps the MAC could conduct. This would make the UK immigration system more fit for purpose, flexible and future proof.

Failing this, the following are occupations known to be in shortage:

General/Packing Operative - 8111,
9134, 5433
Hygiene Cleaner - 9132
Storeman/Forklift Driver – 8222
Chef - 5434
Baker - 5432
F&B Manager - 5436
Retail Manager - 1190
Waiter/Waitress - 9273
Retail Assistant - 7111
Butcher - 5431
Fish farm technicians - 5111

Seasonal Fruit Pickers – 9119
Fish farm workers (hatchery and
marine) - 9119
Bar Supervisor - 9274
Manager Public House -1224
Poultry Stockpersons - 9111
Fish harvesters, processors, mongers
and Poultry Dressers - 5433
Production/Assembly Workers - 8139
Kitchen And Catering Assistants –
9272

Scotland Food & Drink and our partners remain committed to engaging with policymakers, industry, and other stakeholders across Scotland and the UK to advocate for a fair and sustainable immigration system that supports the needs of our industry and does not risk its long-term future. We look forward to hearing from you and would welcome the chance to discuss this further.

Yours sincerely,



Iain Baxter, Chief Executive, Scotland Food & Drink

Also signed on behalf of the following partners who endorse this letter:

Tavish Scott, Chief Executive, Salmon Scotland

Donna Fordyce, Chief Executive, Seafood Scotland

Sarah Millar, Chief Executive, Quality Meat Scotland

Lesley Cameron, Chief Executive, Scottish Bakers

Tim Bailey, Chief Executive, Scottish Agriculture Organisation Society

John Davidson, Chief Executive, National Farmers Union of Scotland