

Written evidence submitted by Association of Independent meat suppliers (LS0077)

20th January 2022

Dear Mr Jarrett

Following our recent submission to EFRA in relation to labour shortages in the food and farming sector and our subsequent email following the evidence from Kevin Foster MP we would like to make the following additional submission.

For our members (abattoirs, licensed cutting plants and catering butchers) the issue is based around the recruitment and retention of staff.

Whilst some have sought to position the meat and poultry processing sector as being reliant on cheap often overseas labour, working conditions and pay have improved massively over the last few years.

Surely, any worker who is prepared to travel thousands of miles across the globe to find work is already making an investment in the UK?

They have a wide choice of sectors in which to work but many choose food processing. Their reasons will almost certainly be based around the jobs paying well and the working conditions being acceptable to them.

It is of note that the Migration Advisory Committee's report to the Home Office in 2020 identified Butchers as being a shortage occupation.

Butchery (and by this, I mean the jobs covered by Standard Occupation Codes 5433 and 5431 as well as that of a meat processor SOC 8111) is a skilled job and we welcome SOC 5433 and 5431 being included in the Skilled Worker Visa scheme.

Under the points-based immigration system which is, of course, aligned to the Skilled Worker Visa scheme an applicant is required to score 70 points.

In terms of butchers, many can achieve 60 of the points required on the basis of having a 'sponsor', a job offer and a salary in excess of £25,600.00.

The 10-point shortfall is down to hitting the requirement for English Language, which is set at B1, intermediate.

During the Minister's submission to EFRA, he repeatedly sought to assure the committee that the English Language was equivalent to a Grade G at GCSE.

The Minister also stated in his letter 29th December that level B1 is ‘basic conversational’

We contend that this is simply not the case.

Setting aside the issue that the Minister didn’t appear to know that in 2017 the GCSE Grading system changed from an A to G grade system to a numerical score of 9 to 1 with 9 being the top grade.

The guidance published by the Joint Council for Qualifications for Grade Descriptors for GCSE Summer 2021 [Summer-2021-Grade-Descriptors-GCSE.pdf \(jqc.org.uk\)](https://www.jcq.org.uk/resources/summer-2021-grade-descriptors-gcse.pdf) states that:

To achieve a grade 1, students’ evidence will show that they have demonstrated engagement with sufficient content, achieved some credit across elements of the specification content and achieved credit in some assessment objectives.

This Grade 1 (or formally a Grade G) is, we believe, in no way equivalent to the CEFR Guidance of B1 intermediate which butchers applying for a Skilled Worker Visa must achieve.

The requirement for a Skilled Worker Visa requires that you must prove you can read, write, speak and understand English to at least level B1 on the Common European Framework of Reference for Languages (CEFR) scale

[Common European Framework of Reference for Languages \(CEFR\) Global scale - Table 1 \(CEFR 3.3\): Common Reference levels \(coe.int\)](https://www.coe.int/en/web/common-european-framework-reference-languages/global-scale-table-1) provides the details for B1 (Independent User). This requires that the applicant achieves the following

Can understand the main points of clear standard input on familiar matters regularly encountered in work, school, leisure, etc.

Can deal with most situations likely to arise whilst travelling in an area where the language is spoken.

Can produce simple connected text on topics which are familiar or of personal interest.

Can describe experiences and events, dreams, hopes & ambitions and briefly give reasons and explanations for opinions and plans.

We have looked at some of the tests being offered by the Government’s Approved Test Providers: <https://www.gov.uk/guidance/prove-your-english-language-abilities-with-a-secure-english-language-test-selt#approved-test-providers>

And suggest that this example from Trinity College London: [B1 Test Booking | Book GESE Grade 5 Test | Trinity College London](https://www.trinitycollege.com/eng-test-booking) is typical of what students are required to do.

It is of note that they believe a B1 test to be the equivalent of GSCE Grade 5 (formally a Grade E).

Looking at the speaking and listening task examples [Speaking & Listening | Trinity College London](https://www.trinitycollege.com/eng-test-booking) these include subjects such as Burlington Arcade and Dolphins.

Within the conversational exercises there are questions along the line of:

“My aunt’s coming to stay with me for a week. Can you come up with some ideas for entertaining her?”

It is our view that the English Language test for butchers should be more work specific and have an element of real day scenarios such as how to contact the emergency services or asking directions.

We also believe that given the Government has announced a new 12-month Health and Social Care visa [Click Here](#) as a means to try to reduce the vacancies within that sector, they too should introduce a food processing and manufacturing visa, again for a 12-month period. This would allow for migrant labour to come to the UK, fill some of the estimated 140,000 vacancies that exist within the food industry and for them to learn English to the required B1 standard whilst working.

Turning now to sponsorship and licensed sponsors. We welcomed the Government’s intervention for both seasonal poultry workers and pork butchers but are at a loss to understand why it is a requirement for recruiting these staff for businesses, many of whom already hold sponsorship licenses, to have to use one of the four Government nominated labour providers?

This added an unnecessary expense to recruitment of the roles of seasonal poultry worker and pork butcher and may suggest a reason why take up did not reach the levels expected by Government or required by the industry.

Surely the Government should concede that PLC’s such as Cranswick and Morrisons Supermarkets etc. have not only the skill to recruit the workers they need for processing but also the trust of the Government that those who they recruit are not going to abuse the systems which are in place.

We would like clarity from the Government that any food processing business holding a skilled worker sponsor’s license be allowed to recruit as they see fit from overseas labour pools and not be constrained by having to use Government appointed labour providers.

Finally, we’d also like to add some views on the **Skilled Worker visa: eligible occupations and codes:** [Click Here](#)

At present this includes:

Standard Occupation Code 5431 – Butchers – covers, Butcher, Butcher’s assistant, Butchery Manager, Master Butcher, Slaughterman

And

Standard Occupation Code 5433 – Fishmongers and poultry dressers – covers, Butcher (fish, poultry), Filleter (fish), Fish processor, Fishmonger, Poultry Processor.

However, the role of a Meat Processor is not included on the **Skilled Worker visa: eligible occupations and codes**

Looking at the **ONS Occupation Coding Tool: [Click Here](#)** the role of 'Meat Processor' is classified within SOC 8111, Food, drink and tobacco process operatives.

The definition given for a Meat Processor is as follows: "operates and attend machinery to bake, freeze, heat, crush, mix, blend and otherwise process foodstuffs"

The definitions for Poultry Processor and Fish Processor are:

Poultry Processor: removes feathers and internal organs, extracts edible offal, and cuts off feet and head from poultry carcasses and dresses as required; cleans tools and work surfaces.

Fish Processor: scrubs, de-scales, heads, guts, washes, and bones fish; cuts and slits fish for curing by hand or machine

We believe that there are sufficient similarities between the tasks undertaken by a Meat Processor and those of a fish and / or poultry processor.

We would like to see the role of Meat Processor reclassified within the Standard Occupation Code system from its present SOC 8111 to SOC 5431. This would bring the role into line with those within SOC 5433.

AIMS is of course more than happy to provide evidence via Teams or Zoom to EFRA and we welcome Mr Foster's letter 29th December correcting some of the points he made.

With Regards