



Seasonal Worker Interest Group (SWIG) Statement - response to The Employer Pays Principle (EPP) Feasibility Study within the Horticulture Value Chain

17 July 2025

On 8 July 2025, the “Employer Pays Principle Feasibility Study within the Horticulture Value Chain” was published by Alma Economics following co-commissioning by the Department of Environment, Food and Rural Affairs and Seasonal Worker Scheme Taskforce. [The Employer Pays Principle \(EPP\)](#) states that no worker should pay for a job - the costs of recruitment should be borne by the employer not the employee. Respect for the principle is fundamental to combatting exploitation, forced labour and trafficking in global supply chains. From the outset it is worth noting that for many years, despite supply chain actors identifying the importance of migrant seasonal workers to domestic food production and security, workers, who exert the least amount of power and have the least access to capital vis-a-vis other stakeholders in the sector, have consistently borne the costs of recruitment, in direct contravention of EPP.

Notwithstanding the findings of this report, there are important considerations which must be at the heart of any implementation of EPP on the Seasonal Worker visa (SWV). Firstly, we reiterate our firm support for EPP and its adoption as a standard on the SWV, as well as other work migration routes into the UK. In our view, EPP is an important cornerstone of ethical international recruitment and should be codified into domestic law, though in the short term failure to do so should not be used as justification for delaying its voluntary implementation by the UK government and other commercial actors on this and other migration routes. International standards established by [the ILO](#) and [IOM](#) make clear that workers’ flights and visas are costs associated with their recruitment and as such must be borne by employers not workers.

The current level of legal fees and illegal charges borne by workers on the SWV, which can run into thousands of pounds, places workers at high risk of debt bondage and incentivises unscrupulous third parties to profit from the labour migration process. We note in particular the high cost of travel for most workers, the visa application fee for the SWV which has now reached £319 (which makes it extremely costly relative to its length), the lack of guaranteed income over the short visa period, and the low pay for seasonal agricultural workers. In addition, we condemn the view that migration debts on the SWV incentivise greater worker

compliance and productivity - this is a perverse notion and one that supports the idea of institutionalising debt bondage.

While the report by Alma Economics provides different examples of how EPP may be operationalised on the SWV, our focus is on ensuring that any discussions around EPP and its implementation abides by core principles that maintain and act in the interests of migrant workers and their welfare. For example, we do not support any model for implementing EPP which involves workers fronting the costs of recruitment (e.g. so-called “ethical loan schemes”), nor do we support a model that results in workers being practically tied to individual workplaces as a result. Workers must have flexibility to change workplaces when in the UK on the SWV, and EPP should not result in costs being directly or indirectly passed on to workers in other ways (e.g. through the use of repayment clauses, non-payment of wages, increased productivity targets/pressure etc.). Implementation of EPP should cover the full costs of SWV recruitment borne by workers, including visa application fees. We are clear that responsibility for implementing EPP must be shared across the spectrum of supply chain actors that use and benefit from the SWS, as well as the government itself.

Though we are supportive of EPP, we are also clear that EPP implementation is not a panacea for the wide range of issues that workers continue to face on the SWV. Previous research by members of the SWIG, government and independent reviews of the SWV have highlighted that the scheme as currently designed puts workers at serious risk of exploitation and abuse, including trafficking, debt bondage and forced labour. The SWV requires wholesale reform - many of the issues for workers on the scheme are complex and interrelated, meaning it is not conducive to worker welfare to reform it on an incremental basis. Principally, there is an urgent need for robust state-led rights protections, and monitoring and enforcement which rise to the challenges of this scheme and ensure accountability of private sector actors.

The UK government has a duty to safeguard the welfare and interests of migrant seasonal workers who play a crucial role in propping up the horticulture sector and the food supply chain more generally. It also has a duty to other stakeholders in the horticulture supply chain, including growers. Private sector actors must be held more accountable for their role in upholding the welfare and human rights of workers on the SWV, but the UK government also cannot abdicate its responsibility on these issues. Indeed, the UK government’s recently updated “Transparency in supply chains” guidance states that companies wishing to undertake responsible recruitment “should follow the Employer Pays Principle”. The government therefore cannot sensibly call for anything but the mandatory implementation of EPP on the SWV if it takes its own commitments around responsible business conduct and human rights seriously. We therefore call on the government to swiftly coordinate the safe and ethical implementation of EPP on the SWV in a way that protects workers.

Work Rights Centre
Worker Support Centre
Anti Trafficking and Labour Exploitation Unit (ATLEU)
FairSquare
Focus on Labour Exploitation (FLEX)
Landworkers’ Alliance
Anti-Slavery International

Notes to editors:

- The Seasonal Worker Interest Group is an alliance of key organisations that provide support to, or advocate for, migrant seasonal workers. As the only group working exclusively in the interests of migrant seasonal workers, the coalition seeks urgent action in response to growing evidence of incidences of poor treatment of workers on the Seasonal Worker Visa identified by its members and [continues to advocate for the scheme to be overhauled](#). The Organising Committee members are Anti Trafficking and Labour Exploitation Unit (ATLEU); Focus on Labour Exploitation (FLEX); Work Rights Centre; and Worker Support Centre. Associate members are: Trades Union Congress; Unite the Union; FairSquare; AntiSlavery International; Law Centre Northern Ireland and The Landworkers' Alliance.