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Consultation on the operation of the Gangmasters Licensing (Exclusions) Regulations 2006

July 2008

Department for Environment, Food and Rural Affairs
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<http://www.defra.gov.uk/corporate/consult/foodfarming.htm>

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Consultation Letter

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Dear Consultee

Consultation on the operation of the Gangmasters Licensing (Exclusions) Regulations 2006

1. I am writing to invite views on the operation of the Gangmasters Licensing (Exclusions) Regulations 2006.
2. The following documents may be found on Defra's website at <http://www.defra.gov.uk/corporate/consult/gangmasters-regs/>
 - Consultation letter
 - List of consultees
 - Consultation paper
 - Initial Impact Assessment

Responses

3. Throughout the consultation document and initial Impact Assessment there are specific questions aimed to help Defra to make an informed assessment of how these regulations are operating. These are listed in Annex C and we would be particularly interested to hear your views on them.
4. Please send responses to me at:

Gangmasters, Employment and Tenancies Team
Defra
Zone 5E, 9 Millbank
c/o Nobel House
17 Smith Square
London
SW1P 3JR
Email: exclusionregs@defra.gsi.gov.uk
5. **Responses should be received by 20 October 2008.**

Consultation criteria

6. This consultation is in line with the Code of Practice on Consultations. This can be found at <http://www.berr.gov.uk/bre/>
 - Consult widely throughout the process, allowing a minimum of 12 weeks for written consultation at least once during the development of the policy
 - Be clear about what your proposals are, who may be affected, what questions are being asked and the timescale for responses
 - Ensure that your consultation is clear, concise and widely accessible
 - Give feedback regarding the responses received and how the consultation process influenced the policy
 - Monitor your department's effectiveness at consultation, including through the use of the designated consultation co-ordinator
 - Ensure your consultation follows better regulation best practice, including carrying out a Regulatory Impact Assessment if appropriate
7. When this consultation ends, we intend to place a copy of the responses in the Defra library at Ergon House, London. This is so that the public can see them. Members of the public may also ask for a copy of responses under freedom of information legislation.
8. If you do not want your response – including your name, contact details and any other personal information – to be publicly available, please say so clearly in writing when you send your response to the consultation. Please note, if your computer includes a confidentiality disclaimer, that won't count as a confidentiality request.
9. Please explain why you need to keep details confidential. We will take your reasons into account if someone asks for this information under freedom of information legislation. But, because of the law, we cannot promise that we will always be able to keep those details confidential. We will summarise all responses and place this summary on our website at <http://www.defra.gov.uk/corporate/consult/gangmasters-regs/>. This summary will include a list of names of organisations that responded but not people's personal names, addresses or other contact details.
10. To see consultation responses and summaries, please contact the library at:

Defra
Information Resource Centre
Lower Ground Floor
Ergon House
17 Smith Square
London
SW1P 3JR

Telephone 020-7238-6575
Email: defra.library@defra.gsi.gov.uk

Please give the library 24 hours' notice. There is a charge for photocopying and postage.

Consultation Letter

11. If you have any comments or complaints about the consultation process, please address them to Marjorie Addo, Defra's Consultation Co-ordinator, Area 7C Nobel House, 17 Smith Square, London SW1P 3JR, or email consultation.coordinator@defra.gsi.gov.uk.
12. Thank you for your help in this matter. If you have any queries please contact us as above.

Yours sincerely

Ian Kelly
Department for Environment, Food and Rural Affairs



Summary

- Your views are invited on proposals to clarify the terms of the Gangmasters Licensing (Exclusions) Regulations 2006.
- Feedback received from stakeholders about the way that the 2006 Regulations are operating suggests some refinement may be necessary to fine-tune the range of excluded circumstances.
- This consultation also offers you the opportunity to identify any other areas of the Regulations which you consider need refinement.
- The Government is not proposing to make substantive changes to the scope of the Gangmasters Licensing Scheme. Therefore this consultation does not seek views on making major revisions to the existing boundary set by the 2006 Regulations.

Background

1. The Gangmasters (Licensing) Act 2004 was drafted in broad terms to require all labour providers operating in agriculture, horticulture, the processing and packaging of agricultural, fish and shellfish produce, and the gathering of shellfish to obtain a licence. As a result of the way that the Act was drafted, certain circumstances – which do not involve the activity of labour providers or where the risk of exploitation of workers and other illegal activity by labour providers is minimal – are brought within the definition of acting as a gangmaster.
2. The Gangmasters Licensing (Exclusions) Regulations 2006 fine-tune the scope of the licensing arrangements by specifying circumstances where a person does not need to obtain a licence. Annex A contains a copy of the Regulations and Annex B summarises the principal activities which the current regulations exclude from the scope of the scheme.

Discussion

3. In broad terms the current arrangements have mapped reasonably accurately those areas where providers of gang labour are active, while excluding peripheral labour supply arrangements which do not represent the supply of gang labour or where the risk of exploitation of workers and other illegal activity by labour providers is low. However feedback received from stakeholders since the Regulations were made in 2006, suggests that some refinement may be necessary to widen the range of excluded circumstances and to clarify the terms we have used to define the current exclusions. The activities which the industry has brought to our attention are discussed in more detail in the remainder of this consultation document. They include circumstances which were never intended to be covered by the licensing system in the first place, such as charities which supply workers into the sectors covered by the Act. It has also been suggested that the terms used to define some of the existing exclusions should be relaxed to exclude informal or co-operative arrangements between farmers which do not involve the activity of mainstream labour providers.
4. The Government is not intending to use this consultation to initiate a fundamental review of the scope of the scheme. We are not seeking views on proposals to extend licensing to other sectors in the food chain, such as the retail and catering industries. Nor is the Government seeking views on proposals to remove the food processing sector from the scope of licensing, which was considered thoroughly at the time of the second consultation on the Exclusion Regulations at the end of 2005. There is general agreement among stakeholders, Government and the GLA that a fundamental review would be unhelpful and disruptive. Rather the focus of this consultation is focused on mainstream agricultural and forestry activities where clarification and revision of the terms of the Regulations could lighten burdens without opening up potential loopholes that could be exploited by those seeking to avoid licensing.

Proposals made by stakeholders to change the Exclusions Regulations

5. Several changes to the terms of the Exclusions Regulations have been suggested by stakeholders. The purpose of these changes can be broadly categorised as follows:
- i) to relieve the burden imposed by licensing on mainstream farming and forestry practices which do not involve the use of labour providers;
 - ii) to remove from the scope of licensing other activities caught by the licensing requirement which do not represent labour provider activity; and
 - iii) to clarify and make more transparent the application of the terms used in the Regulations to describe the activities excluded from licensing.

Your views are sought on all of the proposals described in detail below. You are also invited to identify other areas in the Regulations which you think should be excluded or clarified and to explain why you think such a change is necessary.

Definitions used in paragraph 1 of the Schedule to the Exclusions Regulations

6. Paragraph 1 of the Schedule to the Exclusions Regulations (see Annex A) provides definitions of the terms used in the remaining paragraphs of the Schedule to describe the circumstances where a licence is not required. Many of these terms were not previously defined in existing legislation when we developed the Regulations and hence were untested in a legal framework. We think in general that the definitions we have used convey fairly accurately and unambiguously the meaning of the terms we have used. However, to date no case law has been established about the operation of these Regulations.
7. However, one stakeholder has suggested that the definition of “share farming agreement” used by these Regulations is unnecessarily restrictive. The current definition is:
- “an agreement entered into between two or more persons to share the gross receipts of –
- (a) their separate business assets; or
 - (b) services for carrying out specified farming operations,
- As divided between them and paid to the business in agreed proportions.”

It has been suggested that this definition should be replaced by one where the receipts shared are “net”, as share farming agreements usually share net receipts for the express purpose of creating a group working structure while avoiding the need to form a partnership (where the partners would be jointly and severally liable to the creditors).

Q1. Do you agree that the definitions used in the Regulations convey accurately the terms used?

Q2. If not, which definitions need further clarification, and why?

Q3. Do you think the definition of “share farming agreement” is too restrictive? If so, how do you think it should be changed?

Paragraph 4 of the Schedule to the Exclusions Regulations – Short-term farmer to farmer loans

9. Paragraph 4 of the Schedule to the Exclusions Regulations specifies those circumstances which do not need to be licensed when workers are loaned between farmers. These circumstances include:

- i) the short term loan of workers,
- ii) the exceptional loan of workers originally supplied by a labour provider, and
- iii) the loan of workers on a farm which is the subject of a share farming agreement between the two farmers.

The purpose of this exclusion is to exclude from licensing a mainstream farming practice which does not represent gangmaster activity though it is defined as such by the Act.

10. Sub-paragraph 4(b) provides for the exclusion of workers lent by one farmer to another. In order for the lender to qualify for this exclusion, the worker lent must not work for the borrower for more than 20% of the total hours that the worker worked for the lender in the three months prior to the commencement of the loan. Some stakeholders have claimed that this 20% rule (as it is known) is too restrictive as it cannot always accommodate the seasonal peaks and troughs of the agricultural cycle. For instance, it is argued that the 20% limit (which broadly equates to a maximum period of 2½ weeks) is insufficient in the case of workers loaned to undertake activities – such as spring cereal sowing, lambing, calving, potato lifting and vegetable harvesting – which could take considerably longer than 2½ weeks. Others argue that this rule, which deters some farmers from employing workers as direct employment is economically viable only when the farmer is able to offset the cost of employment by loaning workers to other farmers during periods of low activity. In this view the financial benefit stemming from the loan of workers is outweighed by the cost of obtaining a licence.
11. Information about the frequency of farmer to farmer loans of workers is not collected by any formal survey. Informal soundings taken by one agricultural stakeholder suggest that most farmers who employ workers are caught by the 20% rule.
12. The 20% limit was set at this level as it was thought to balance best the need of farmers for flexibility in running their businesses with the need to ensure that this exclusion does not provide a loophole which could be exploited by labour providers in order to avoid licensing. In principle the Government is not opposed to relaxing the 20% limit exclusion if it removes genuine constraints on the operation of farm businesses. However, in doing so it will need to be satisfied that it will not allow mainstream labour providers to circumvent the licensing system.
13. The terms of this exclusion could be varied in several ways in order to provide greater flexibility for farmer to farmer loans. The 20% rule could be increased to, say, 30%, 40% or 50%. Alternatively, the current reference period of three months could be extended to 6, 9 or 12 months. Combinations of variations in the 20% rule and the length of the reference period could also be used to define the terms of this exclusion. A further option is to allow the loan of one or two workers between farmers without any restriction on the length of the loan but to impose a cap on the supply of more than one or two workers so that the loan of three or more workers would require a licence.
14. At present the terms of paragraph 4(b) only apply to loans of workers between farmers (including businesses engaged in forestry). It has been suggested that the terms of this provision could be extended to cover loans of workers between employers operating in other areas covered by the licensing scheme (such as food manufacturing).

15. Sub-paragraphs 4(a) and 4(c) provide, respectively, for the supply of workers between farmers to do work on a farm which is the subject of a share farming agreement between the two farmers (4(a)) and the supply of a gang worker between farmers where the worker has been supplied by a labour provider (4(b)). Unlike the exclusion at sub-paragraph 4(b), the Government has not received representations that the terms of these exclusions are having an adverse impact on farming practices. Therefore we do not propose to change the terms of these exclusions.

Q4. Do you consider that the 20% rule restricts the flexible operation of mainstream farming practices involving the loan of workers between farmers? If your answer is yes, do you have evidence to support your response?

Q5. Do you think that the terms of the exclusion for farmer to farmer loans of workers should be relaxed? If so, why and how?

Q6. Should the terms of the exclusion for farmer to farmer loans be extended to short-term loans of workers to undertake non-agricultural activities covered by the Act?

Q7. Do you agree that the terms of the Exclusions contained at sub-paragraphs 4(a) and 4(c) should remain unchanged? If not, why?

Paragraph 5 of the Schedule to the Exclusions Regulations – Short-term services between farmers involving the use of a worker

16. This paragraph specifies those circumstances excluded from the scope of licensing when services involving the use of a worker are supplied between farmers. To qualify for the exclusion the service supplied must involve a one-off arrangement of less than two weeks (sub-paragraph 5(a)). Furthermore, where the supplier of the service is using a worker he employs, then the 20% rule must be met (5(b)). Where the service involves the use of a worker provided by a gangmaster, the farmer supplying the service must obtain the agreement of the gangmaster that the worker can be used to deliver the service (5(c)).

17. This paragraph largely reflects the terms of the exclusions provided at Paragraph 4 of the Schedule. This is necessary as the definition of acting as a gangmaster in the 2004 Act includes both the supply of workers and also the supply of services involving the use of workers to deliver that service. The Government is not intending to relax the limit on the duration of services provided by one farmer to another involving the use of gang workers. However it could be argued (for the same reasons identified in the discussion above about Paragraph 4 of the Schedule) that the limit could be relaxed where the service is delivered by directly employed workers.

18. It has been argued that condition (c) of the terms of this exclusion can be interpreted as standing on its own and not linked to condition (a). In this interpretation a farmer who provides a service to another farmer with the use of gang labour supplied by a third party is not constrained by the limitation over the length of duration of the service set at (a). Defra disagrees with this interpretation as it is our view that paragraph 5 should be construed in the way that it was intended with (c) being linked to (a). However, we appreciate that to some the meaning could appear ambiguous. In view of this we intend to review the wording of this exclusion in order to remove any ambiguity about its application.

Q8. Does the 20% rule restrict the flexible operation of traditional farming practices involving the supply of services? If your answer is yes, what evidence do you have to support your response?

Q9. Do you think that the terms of the exclusion for the supply of services between farmers should be changed? If so, why and how?

Q10. Do you agree that there is a need to review the wording of the exclusion to make it clear that the provisions of the exclusion are interdependent?

Paragraph 13 (specialist workers)

19. This paragraph provides for the exclusion from licensing of the supply of a specialist worker to undertake agricultural work. In order for the labour provider to qualify for exemption from licensing the worker supplied must meet the following conditions:

- (i) The worker must be supplied to undertake work in which the worker is specialised,
- (ii) The labour user requires the worker to hold a qualification at or above NVQ Level 2 (or equivalent) which is relevant and necessary for the work the worker is supplied to undertake,
- (iii) The labour user employs the worker supplied, and
- (iv) On the day the worker is supplied no other worker is supplied by the labour provider.

20. Several stakeholders have argued that the terms of this exclusion are overly prescriptive and should be relaxed. Some have suggested that the current limitation on the number of specialist workers that can be supplied at any one time should be increased from the current limit of one as skilled workers are likely to be better able to protect their employment rights than unskilled workers. Others would like to see the removal of the condition which requires that the worker supplied must be employed by the labour user. In addition, it has been suggested that the terms of this exclusion should be widened to exclude from licensing the supply of workers who have gained their skills through practical experience rather than formal education. At present labour providers who supply self-taught workers cannot obtain an exemption from licensing, even though those workers may be performing identical tasks to their formally qualified counterparts.

Q11. Is the current threshold of one worker supplied at any one time too low? If it is what should it be changed to and why?

Q12. Should competences gained through experience also qualify for exclusion from licensing?

Q13. Should the requirement that the skilled worker supplied by a labour provider must be employed by the labour user be retained? If not, why not?

Quasi public organisations and charities

21. Some charitable organisations and public bodies used by Government to deliver publicly funded services fall within the definition of acting as a gangmaster in the Gangmasters Licensing Act 2004. Examples include Remploy, Mencap and various bodies funded by Jobcentre Plus and the European Social Fund which are engaged – for instance -in preparing the unemployed for work. Where these bodies place workers with employers in sectors regulated by the Act they are regarded by the Act as acting as gangmasters. It was never intended that these types of organisations should be regulated by licensing. This review offers the opportunity to regularise their current position by excluding their activities from the requirement to be licensed. In excluding these types of organisations we will need to define carefully the terms of the provision to ensure we do not create a loophole which could be exploited by those claiming to deliver publicly funded services.

Q14. Do you agree that charities and public bodies used to deliver charitable services should be excluded from the gangmaster licensing arrangements?

Q15. Should there be a blanket exclusion for such organisations, or are there any organisations which you think should be retained within the scope of the scheme? If so, why?

Q16. Which organisation do you suggest should be excluded?

Supply between separate corporate bodies in the same ownership

22. The supply of workers or services involving the use of workers between separate legal entities which are incorporated bodies represents a supply for the purposes of the 2004 Act. Therefore the incorporated body which supplies the worker or service must obtain a licence. This requirement applies even when the supply takes place between incorporated bodies which are under the same ownership.
23. The supply of workers or services between separate corporate bodies in the same ownership is not uncommon in groups of companies where one company in the group is responsible for recruiting and organising the labour needs of the other companies in the group. It is argued that this circumstance should be excluded from licensing as workers supplied between separate bodies within the same group are unlikely to be exploited as the supply is undertaken to meet the logistical needs of the group rather than for commercial purposes.
24. By contrast, it could be argued that excluding this circumstance from licensing could open up a loophole through which, for instance, labour providers and users reorganise themselves into a group of commonly owned incorporated companies under the same holding company in order to avoid licensing. In view of this the Government would need to be satisfied that providing for an exclusion for a supply between corporate bodies in the same ownership does not provide an incentive for avoiding licensing in this way.

Q17. Do you think that supplies between corporate bodies within the same ownership should be excluded from licensing?

Q18. If we excluded this circumstance do you think it would be easy for labour providers and users to restructure their activities in order to take advantage of this exclusion?

Pea vine co-operatives

25. It has been argued that members of an agricultural co-operative who provide labour to the co-operative in order to assist in the cultivation or harvest of the members' crops should be excluded from the licensing.
 26. A typical scenario might involve that of a pea vine or sugar beet co-operative where cooperation between growers is necessary in order to purchase and operate expensive and specialised harvesting equipment. At harvest time the co-operative will hire workers from its members to harvest the crop of individual members using the machinery acquired by the co-operative. This might involve the workers and machinery travelling from one holding to the next to undertake the harvest until all of the holdings had been harvested. This could take 2-3 months to complete.
 27. This arrangement falls within the definition of gangmaster activity in respect of the supply of a worker by the co-operative member to the co-operative. In some instances it might be possible for a member to obtain an exemption under the farmer to farmer loans provision of the Exclusions Regulations. However it is likely that most loans (due to the length of the harvest) will fall foul of the 20% rule.
 28. Government policy is to encourage co-operative ventures in farming. In the case of a pea vine or sugar beet co-operatives the Government would not want to hinder or impose an unnecessary burden on co-operative effort by making it a requirement that each member of the co-operative who supplies a worker to the co-operative should obtain a gangmasters licence. However, the Government is not proposing to exclude from licensing the labour pools maintained by co-operatives which are used to meet the day to day labour needs of the members as these act no differently from mainstream labour providers.
- Q19. Do you think that arrangements – such as pea vine co-operatives or sugar beet co-operatives – where workers are loaned to the co-operative to undertake harvesting duties for the co-operative should be excluded from the licensing arrangements?**

Forestry industry

29. The definition of agricultural work contained in the Gangmasters (Licensing) Act 2004 is based on the definition in the Agricultural Wages Act 1948. This provides that “agriculture” shall include “dairy farming, the production of any consumable produce which is grown for sale or consumption or other use for the purposes of a trade or business or of any other undertaking (whether carried on for profit or not) and the use of land as grazing, meadow or pasture land or orchard or osier land or woodland or for market gardens or nursery grounds”. In the light of the inclusion in the definition of the use of land as woodland, Defra takes the view that all work connected with the planting, establishment, maintenance and harvesting of woodland or forests is agricultural work. Therefore a person who supplies a worker to do forestry work or uses a worker in the supply of a forestry service is regarded by the 2004 Act as acting as a gangmaster and is required to obtain a licence in respect of that activity. The inclusion of forestry within the scope of the Act was confirmed by Defra Ministers during the passage of the Bill.
30. Labour providers operating in the forestry industry are entitled to the same exclusions open to their farming and contractor counterparts in agriculture. Probably the provision which is of most relevance to the forestry industry is the exemption of agricultural machinery services. The provisions governing the loan of workers and the supply of specialist workers could also be of benefit to some operators in this sector.
31. Several stakeholder organisations and individuals in the forestry sector have argued that the forestry sector should be taken out of the scope of the licensing scheme as there is little evidence of worker exploitation, the use of gang labour is low and the industry is already closely regulated by enforcement bodies such as the Health & Safety Executive. Against this, others argue that there are occasions when large numbers of seasonal and casual workers are supplied to undertake forestry work and these workers should be offered the same protection as their counterparts in agriculture.

Q20. Do you think forestry should be removed from the scope of the licensing scheme? If yes, why?

Q21. Should licensing apply only to part of the forestry sector? If yes, to which activities should it apply?

What to do next

32. Views and contributions are welcome from all individuals and organisations with an interest in this consultation. Please:
 - (i) read the consultation paper and partial Impact Assessment,
 - (ii) consider the questions asked in this consultation paper (which are listed at Annex C), and
 - (iii) submit your comments using the contact details provided in the covering letter.
33. Please send your replies by 20 October 2008 at the latest.

STATUTORY INSTRUMENTS

2006 No. 658

EMPLOYMENT

The Gangmasters Licensing (Exclusions) Regulations 2006

Made	8th March 2006
Laid before Parliament	13th March 2006
Coming into force	6th April 2006

The Secretary of State makes the following Regulations in exercise of the powers conferred by section 6(2) of the Gangmasters (Licensing) Act 2004^(a):

Citation, commencement and interpretation

1.—(1) These Regulations may be cited as the Gangmasters Licensing (Exclusions) Regulations 2006 and come into force on 6th April 2006.

(2) In these Regulations, “the 2004 Act” means the Gangmasters (Licensing) Act 2004.

Circumstances in which a licence is not required

2. A person does not require a licence to act as a gangmaster under section 6(1) of the 2004 Act in the circumstances specified in paragraphs 2 to 15 of the Schedule.

8th March 2006

Bach
Parliamentary Under Secretary of State
Department for Environment, Food and Rural Affairs

^(a) 2004 c. 11.

Regulation 2

Circumstances in which a Licence is not required under the 2004 Act

1. In this Schedule—

“catering establishment” means—

- (a) a restaurant, canteen, club, public house, school kitchen, prison kitchen, hospital kitchen or similar establishment (including a vehicle or a fixed or mobile stall) where—
 - (i) food is cooked or made ready for consumption without further preparation; and
 - (ii) food is prepared for service to the consumer.
- (b) other premises used solely for the purpose of cooking or making food ready for consumption, without further preparation, after delivery to the consumer;

“distribution warehouse” means premises where produce is received prior to onward distribution to a wholesale or retail establishment and—

- (a) there is no change in the ownership of the produce concerned between receipt and onward distribution; and
- (b) the wholesale or retail establishment to which delivery is made is excluded under paragraph 2 of this Schedule; and
- (c) the premises are owned by the same company that owns the retail or wholesale establishment to which the produce is delivered;

“farmer” means a person—

- (a) who occupies land used for agricultural activities; or
- (b) who owns or operates a business that pursues agricultural activities in whole or in part; or
- (c) is an employed person with management responsibility for all or part of a business that pursues agricultural activities;

“produce” means produce derived from agricultural work, shellfish, fish or products derived from shellfish or fish;

“Seasonal Agricultural Workers Scheme” means a scheme operated by Work Permits UK, part of the Home Office, which allows farmers and growers in the United Kingdom to recruit overseas workers to undertake work that is both seasonal and agricultural;

“share farming agreement” means an agreement entered into between two or more persons to share the gross receipts of —

- (a) their separate business assets; or
- (b) services for carrying out specified farming operations, as divided between them and paid to the businesses in agreed proportions;

“wholesale establishment” means a facility operated solely for the purpose of selling produce for the purposes of resale or to a catering establishment, and includes a cash and carry warehouse.

2. The supply or use of a worker to process or pack produce if the worker is supplied to —
 - (a) a catering establishment;
 - (b) a shop or other retail establishment;
 - (c) a wholesale market;
 - (d) a wholesale establishment;
 - (e) a distribution warehouse.
3. The supply of a worker to process or pack a product which includes a derivative of produce but where the product being packed is not a food product, pet food product or a product which is primarily an agricultural, fish or shellfish product.
4. The supply of a worker for agricultural work by a farmer (A) to another farmer (B) where—
 - (a) the supply is to do work on a farm which is the subject of a share farming agreement between A and B; or
 - (b) the total hours the worker works for B are not more than twenty per cent of the total hours he worked for A in the three months immediately preceding the commencement of the period of work undertaken for B; or
 - (c) the worker has been supplied to A by a person (C) who acts as a gangmaster in making that supply, and the supply by A—
 - (i) is made with C's agreement to the nature of the work to be undertaken for B; and
 - (ii) is a one-off arrangement of less than two weeks.
5. The use of a worker for agricultural work by a farmer (A) in connection with services provided by him to another farmer (B) where—
 - (a) the services provided involve a one-off arrangement of less than two weeks; and
 - (b) the total hours the worker works delivering services to B are not more than twenty per cent of the total hours he worked for A in the three months immediately preceding the commencement of the delivery of services to B; or
 - (c) the worker has been supplied to A by a person (C) who acts as a gangmaster in making that supply, and the use of the worker to deliver services by A is made with C's agreement to the nature of the services to be provided to B.
6. The supply of a worker by a farmer to a contractor to operate machinery supplied by that contractor for the purpose of undertaking agricultural work for that farmer.
7. The supply of a worker by a sole operator in the Seasonal Agricultural Workers Scheme to another Seasonal Agricultural Workers Scheme operator.
8. The use of a worker, for agricultural work by a service provider to provide a service to a farmer—
 - (a) where the service involves the use of machinery owned or hired by the service provider; and
 - (b) the worker is employed by the service provider to operate or to support the operation of that machinery.

- 9.**—(1) The use of a worker by a service provider, in connection with a food and drink processing and packaging service provided to a service user, where the service provider—
- (a) is the worker’s employer;
 - (b) owns, hires or leases any equipment, tools or machinery used by the worker which are necessary to carry out the service; and
 - (c) owns or leases the premises where the work is carried out.
- 10.** The use of a worker to harvest crops by a person who has transferred title to the land on which the crops are grown, but has retained title to the crops.
- 11.** The supply of a person licensed under the Welfare of Animals (Slaughter or Killing) Regulations 1995**(a)** to slaughter animals.
- 12.** The supply of a worker by an educational establishment to undertake agricultural work solely in furtherance of education or training provided to the worker by that establishment leading to an agricultural qualification recognised under sections 96 or 97 of the Learning and Skills Act 2000**(a)**.
- 13.** The supply by a person (A) to a farmer of a single worker to undertake agricultural work in which that worker is specialised where—
- (a) the farmer requires the worker to hold a specific qualification at or above National Vocational Qualification Level 2 or Scottish National Vocational Qualification Level 2 (as recognised under sections 96 and 97 of the Learning and Skills Act 2000), or an equivalent qualification, which is relevant and necessary to ensure the worker can effectively discharge the responsibilities he will be required to undertake; and
 - (b) the farmer employs the worker following his supply by A; and
 - (c) on the day the supply is made, no other worker is supplied to the farmer by A.
- 14.** The supply or use of a worker to gather shellfish before 1st October 2006.
- 15.** On and after 1st October 2006 the use of a worker
- (a) to dive with the aid of breathing apparatus to gather shellfish from the sea bed; or
 - (b) to operate a net, dredge or other machinery used to gather shellfish from the sea bed, other than a hand net or hand-held rake, where the worker is using the net, dredge or other machinery on board a fishing vessel which is operating at sea.

EXPLANATORY NOTE

(This note is not part of the Regulations)

These Regulations make provision for the circumstances in which a licence to act as a gangmaster, granted under section 7 of the Gangmasters Licensing Act 2004 (c.11) is not required.

The circumstances in which a licence is not required are set out in the Schedule.

A Regulatory Impact Assessment of the effect that this instrument will have on the costs of business has been prepared and has been placed in the library of each House of Parliament. Copies may be obtained from the Agricultural Resources Team at the Department for Environment, Food and Rural Affairs, Ergon House, Horseferry Road, London SW1P 2AL.

(a) S.I. 1995/731.

(a) 2000 c 21.

Activities Currently Excluded from the Licensing Scheme

- Share farming arrangements
- Short-term farmer to farmer loans of workers
- Exceptional farmer to farmer loans of gang workers
- Provision of short-term agricultural services between farmers involving the supply of a worker
- The supply of a worker by a farmer to an agricultural contractor to operate machinery supplied by that contractor for use on the farmer's own premise
- The supply of a worker by a sole operator appointed under SAWS to other SAWS operators
- The provision of sub-contract services which involve the use of labour by the sub-contractor but not the supply of labour by the sub-contractor
- The supply of a worker as part of the provision of an agricultural machinery service by an agricultural contractor
- The employment of workers by someone who has sold a farm but retained the ownership of a crop and uses those workers to harvest that crop
- The supply of a qualified slaughterman to work in an abattoir
- The supply of students by an educational establishment
- The supply of an individual skilled worker
- The direct employment of workers to gather shellfish by a fishing vessel
- The supply of workers to process and pack in wholesale, retail and catering establishments

Questions asked by this consultation

- Q1. Do you agree that the definitions used in the Regulations convey accurately the terms used?
- Q2. If not, which definitions need further clarification and why?
- Q3. Do you think the definition of “share farming agreement” is too restrictive? If so, how do you think it should be changed?
- Q4. Do you consider that the 20% rule restricts the flexible operation of mainstream farming practices involving the loan of workers between farmers? If your answer is yes, do you have evidence to support your response?
- Q5. Do you think that the terms of the exclusion for farmer to farmer loans of workers should be relaxed? If so, why and how?
- Q6. Should the terms of the exclusion for farmer to farmer loans be extended to short-term loans of workers to undertake non-agricultural activities covered by the Act?
- Q7. Do you agree that the terms of the Exclusions contained at sub-paragraphs 4(a) and 4(c) should remain unchanged? If not, why?
- Q8. Does the 20% rule restrict the flexible operation of traditional farming practices involving the supply of services? If your answer is yes, what evidence do you have to support your response?
- Q9. Do you think that the terms of the exclusion for the supply of services between farmers should be changed? If so, why and how?
- Q10. Do you agree that there is a need to review the wording of the exclusion to make it clear that the provisions of the exclusion are interdependent?
- Q11. Is the current threshold of one worker supplied at any one time too low? If it is, what should it be changed to and why?
- Q12. Should competences gained through experience also qualify for exclusion from licensing?
- Q13. Should the requirement that the skilled worker supplied by a labour provider must be employed by the labour user be retained? If not, why not?
- Q14. Do you agree that charities and public bodies used to deliver charitable services should be excluded from the gangmaster licensing arrangements?
- Q15. Should there be a blanket exclusion for such organisations, or are there any organisations which you think should be retained within the scope of the scheme? If so, why?
- Q16. Which organisation do you suggest should be excluded?
- Q17. Do you think that supplies between corporate bodies within the same ownership should be excluded from licensing?
- Q18. If we excluded this circumstance, do you think it would be easy for labour providers and users to restructure their activities in order to take advantage of this exclusion?
- Q19. Do you think that arrangements – such as pea vine co-operatives or sugar beet co-operatives – where workers are loaned to the co-operative to undertake harvesting duties for the co-operative should be excluded from the licensing arrangements?
20. Do you think forestry should be removed from the scope of the licensing scheme? If yes, why?
- Q21. Should licensing apply only to part of the forestry sector? If yes, to which activities should it apply?

Summary: Intervention and Options

Department /Agency: Defra	Title: Impact Assessment of the operation of the Gangmasters Licensing (Exclusions) Regulations 2006	
Stage: Partial	Version: 1	Date: 3 June 2008
Related Publications: Consultation paper on the operation of the Gangmasters Licensing (Exclusions) Regulations 2006		

Available to view or download at:

<http://www.defra.gov.uk/corporate/consult/default.asp>

Contact for enquiries: Ian Kelly

Telephone: 0207 238 5702

What is the problem under consideration? Why is government intervention necessary?

The Gangmasters Licensing (Exclusions) Regulations 2006 refine the scope of the Gangmasters Licensing Act 2004 by specifying the circumstances where a licence is not required. Since the Regulations came into force, some stakeholders have argued that they need to be revised in order to clarify their application; and to remove certain agricultural activities from the scope of licensing.

What are the policy objectives and the intended effects?

To clarify the terms of the Gangmasters Licensing (Exclusions) Regulations 2006; and to remove from the licensing requirements those circumstances which do not represent gangmaster activity or where the risk of exploitation is minimal.

What policy options have been considered? Please justify any preferred option.

Ministers have made a public commitment to review the operation of the 2006 Regulations. The circumstances identified in the consultation as possible candidates for exclusion from licensing reflect those that have been brought to our attention by stakeholders since the original regulations were laid in Parliament in 2006. It is possible that others will be identified during the course of this consultation.

When will the policy be reviewed to establish the actual costs and benefits and the achievement of the desired effects?

The operation of the licensing scheme is reviewed annually by the GLA.

Ministerial Sign-off For consultation stage Impact Assessments:

I have read the Impact Assessment and I am satisfied that, given the available evidence, it represents a reasonable view of the likely costs, benefits and impact of the leading options.

Signed by the responsible Minister:

Signed Jonathan Shaw, Minister for Marine, Landscape and Rural Affairs

Date: 26 June 2008

Summary: Analysis and Evidence

Policy Option: 2	Description: Consult on the operation of the Gangmasters Licensing (Exclusions) Regulations
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COSTS	ANNUAL COSTS		Description and scale of key monetised costs by 'main affected groups'	
	One-off (Transition)	Yrs	Amending the Exclusions Regulations will not increase the total cost of the licensing scheme. However as the scheme is expected to be self-financing, the licence costs of remaining licence holders may need to rise marginally to make good the reduction in fee income resulting from the exclusions (see para 11).	
	£ 00			
	Average Annual Cost (excluding one-off)			
	£ 25,250		Total Cost (PV)	£ 25,250
Other key non-monetised costs by 'main affected groups' 0				

BENEFITS	ANNUAL BENEFITS		Description and scale of key monetised benefits by 'main affected groups'	
	One-off	Yrs	Annual benefit represents savings stemming from not needing to obtain a licence and potential administrative savings to the GLA. There will also be a very minor administrative saving to former licensees no longer required to renew their annual licenses.	
	£ 0			
	Average Annual Benefit (excluding one-off)			
	£ up to 83,250		Total Benefit (PV)	£ up to 83,250
Other key non-monetised benefits by 'main affected groups'				

Key Assumptions/Sensitivities/Risks It is assumed that most of any changes made to the Exclusions Regulations will simply regularise the position of businesses, where there is current scope for differing interpretation as to whether a licence is required. It is also assumed that impact on licence fees will be marginal.

Price Base Year 2006	Time Period Years	Net Benefit Range (NPV) £	NET BENEFIT (NPV Best estimate) £ up to 58,000
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What is the geographic coverage of the policy/option?	UK			
On what date will the policy be implemented?	1 April 2009			
Which organisation(s) will enforce the policy?	GLA (no change)			
What is the total annual cost of enforcement for these organisations?	(no change)			
Does enforcement comply with Hampton principles?	Yes			
Will implementation go beyond minimum EU requirements?	No			
What is the value of the proposed offsetting measure per year?	£ 0			
What is the value of changes in greenhouse gas emissions?	£ 0			
Will the proposal have a significant impact on competition?	No			
Annual cost (£-£) per organisation (excluding one-off)	Micro 0	Small 0	Medium 0	Large 0
Are any of these organisations exempt?	No	No	N/A	N/A

Impact on Admin Burdens Baseline (2005 Prices)		(Increase – Decrease)	
Increase of £ 0	Decrease of £ 0	Net Impact	£ 0

Key:

Annual costs and benefits: Constant Prices

Evidence Base (for summary sheets)

[Use this space (with a recommended maximum of 30 pages) to set out the evidence, analysis and detailed narrative from which you have generated your policy options or proposal. Ensure that the information is organised in such a way as to explain clearly the summary information on the preceding pages of this form.]

Purpose and intended effect of the proposal

Background

1. The Gangmasters Licensing (Exclusions) Regulations 2006 fine-tune the scope of the licensing arrangements by specifying circumstances where a person does not need to obtain a licence. In broad terms the current arrangements have mapped reasonably accurately those areas where providers of gang labour are active, while excluding peripheral labour supply arrangements which do not represent the supply of gang labour or where the risk of exploitation is low. However feedback received from stakeholders since the Regulations were made in 2006, suggests that some refinement may be necessary to slightly widen the range of excluded circumstances and to clarify the terms we have used to define the current exclusions. These are discussed in more detail in the consultation document.

<http://www.defra.gov.uk/corporate/consult/gangmasters-regs/>

Rationale for Government intervention

2. Government intervention is necessary to amend the scope of the current Exclusions Regulations. This consultation will canvass views on the need to amend the Regulations.

Consultation

Within Government

3. Defra has obtained the approval of DA Committee to consult on these proposals. The GLA and DARDNI have also been consulted and the Scottish Executive and the Welsh Assembly have been informed of our intention.

Public Consultation

4. A 13 week public consultation runs from 21 July 2008 to 20 October 2008. The responses to that consultation will be analysed after the consultation is complete.

Costs and benefits

Benefits

5. The principal benefit stemming from a relaxation in the terms of the Exclusions Regulations is that it should provide greater flexibility for farmers engaged in informal agricultural practices, such as the loan of workers to other farmers. Revising the terms of the regulations is also intended to provide greater clarity to those labour providers uncertain as to their status under the scheme. This will enable people to carry out their businesses secure in the knowledge that they are acting in accordance with the legislation. Where the new Regulations confirm that a licence is not required there will be a financial benefit in the annual saving to licence holders of not having to renew their licences. This is likely to be limited as few gangmasters are currently

Annex D

licensed under the circumstances identified in the consultation paper for exclusion from licensing. According to the GLA no farmers have applied to the GLA for a licence in respect of the loan of workers to other farmers and the GLA is not aware of any agencies involved in the supply of specialist agricultural workers, quasi public organisations and pea vine and sugar beet co-operatives having applied for a licence.

6. It is thought that two registered charities have applied for a licence. However, these charities are significant providers of labour in their own right and it is not the intention of this consultation to remove their activities from the scope of the scheme. The GLA is also aware that one gangmaster is licensed in respect of the supply of workers between separate corporate bodies within the same ownership.
7. In the forestry sector there are around 50 gangmasters licensed to supply workers to undertake forestry work. The exclusion of this sector from licensing would yield savings to the sector in the form of licence fees that no longer have to be paid. However the savings to the GLA in the form of lower costs to process and monitor licences are likely to be limited as licensed labour providers working in forestry represent around only 4% of the total number of labour providers registered with the GLA. Furthermore in the short term staff costs are fixed and in practical terms the reduction in workload stemming from the exclusion of forestry is likely to be used in part by the GLA to increase the amount of compliance work it undertakes in the non-forestry sector. In view of this the level of administrative savings stemming from the exclusion is likely to be modest. On the basis of the GLA's forecast expenditure in 2008-09 on compliance activities it is estimated that the savings to the GLA stemming from the removal of the forestry sector will fall within the range of £0 to £58,000.
8. A summary of the potential financial benefits is as follows:

Activity	Number of current licence holders	Value of one-off benefit	Value of annual benefit
Change definitions used in paragraph 1	n/a	0	0
Short-term farmer to farmer loans	0	0	0
Short-term farmer to farmer services	0	0	0
Supply of specialist workers	0	0	0
Quasi public organisations and charities	2	0	3500*
Supply between corporate bodies in the same ownership	1	0	1750*
Pea vine and other types of co-operatives	0	0	0
Forestry industry – licence fees and GLA administrative cost savings	50	0	20,000-78,000*
Totals	53	0	20,000-83,250

*based on annual licence fees of £1750 for quasi public organisations and charities, £3500 for supply between corporate bodies etc and £400 for gangmasters operating in the forestry sector and GLA administrative savings of up to £58,000.

Costs

9. It is not anticipated that this proposal will impose any substantial costs on business. The principal purpose of this proposal is to clarify the term of the Regulations and to remove from the scope of licensing those activities which do not represent gangmaster activity. This proposal will not bring additional gangmasters with the scope of the licensing scheme.
10. It is possible that the removal of some gangmasters from the scope of licensing could lead to an increase in licence fees as the GLA is required to cover its operating costs through fee income. However, it is thought that the fee increase required to cover the loss of fee income is likely to be marginal. On the basis of around 1200 licence holders and the assumption that other GLA costs and revenues remain unchanged, it is estimated that the loss of fee income would need to be recouped by an average fee increase of up to £20.

Business sectors affected

11. The licence scheme applies to labour providers who supply labour into the agriculture, shellfish gathering and the food, fish and shellfish processing and packaging sectors in the UK.

Cost to Government

12. It is not anticipated that this proposal will impose additional costs on Government. The GLA is expected to cover its operating costs through income derived from licensing. Enforcement costs and the cost of providing for an appeals mechanism will continue to be met by Government and it is not anticipated that these will change.

Small firms impact test

13. The gangmaster industry is largely made up of small firms. Therefore small firms will be the principal beneficiary of any proposal to reduce the scope of the licensing scheme by revising the Exclusions Regulations.

Competition Assessment

14. The impact of this proposal on competition in the labour provider industry is expected to be limited. It is possible that the exclusion of quasi public bodies could have an adverse impact on the competitiveness of licensed labour providers. However, this impact is likely to be very marginal as the two types of provider operate in largely separate segments of the industry and for different purposes.

Equality and Fairness

15. This proposal will not have any impact on under-represented groups.

Human Rights

16. This proposal does not raise any human rights issues.

Scotland, Wales and Northern Ireland

17. The Gangmasters Licensing (Exclusions) Regulations 2006 apply to England, Scotland and Wales. Separate regulations apply to gangmasters operating in Northern Ireland.

Impact on rural communities, environmental impact, sustainable development

18. No impact on rural communities or the environment is anticipated. The proposal will be neutral with respect to sustainable development.

Enforcement, sanctions and legal aid

19. The Gangmasters (Licensing) Act 2004 established the GLA to operate a licensing scheme for gangmasters and to maintain a register of licensed gangmasters. The principal offences created by the Act are operating as an unlicensed gangmaster, engaging the service of an unlicensed gangmaster and using false documentation. The maximum penalty created by the Act is imprisonment of up to 10 years. There are no recommendations in this proposal to change these offences and sanctions and there are no implications for legal aid.

Monitoring and Review

20. The GLA is required to keep the operation of the licensing regime under review.

Summary and Recommendation

21. This proposal is expected to generate minor financial benefits to the industry and to impose no cost on Government. The principal purpose of the proposal is to clarify the operation of the Exclusions Regulations. This proposal does not intend to make fundamental changes to the scope of the licensing scheme.

Specific Impact Tests: Checklist

Use the table below to demonstrate how broadly you have considered the potential impacts of your policy options.

Ensure that the results of any tests that impact on the cost-benefit analysis are contained within the main evidence base; other results may be annexed.

Type of testing undertaken	Results in Evidence Base?	Results annexed?
Competition Assessment	Yes	No
Small Firms Impact Test	Yes	No
Legal Aid	Yes	No
Sustainable Development	Yes	No
Carbon Assessment	Yes	No
Other Environment	Yes	No
Health Impact Assessment	Yes	No
Race Equality	Yes	No
Disability Equality	Yes	No
Gender Equality	Yes	No
Human Rights	Yes	No
Rural Proofing	Yes	No

List of consultees:

- "OSKAR" Agencja Rekrutacyjna
- 118 Recruitment Ltd
- 1st Call Recruitment Services Ltd
- 1st Choice Personnel
- 1st Choice Recruitment
- 1ST Universal Services Limited
- 247 Staff
- 2m Recruitment Ltd
- 5 Star Facility Management Limited
- 725 Ltd
- 7Y Services Ltd
- A & L Blower
- A & M Penman & Sons
- A & T Active Recruitment Ltd
- A B J Consultancy Service
- A D Fisher
- A Helping Hand (LLC) UK Limited
- A J Westmore
- A K R Services Ltd
- A La Carte Recruitment Ltd
- A M Workers Ltd
- A Massie & Son
- A P R Agency
- A P S Recruitment Ltd
- A To B Services
- A.S.A.P. (SW) Ltd
- A.W. Jenkinson Forest Products
- A.Z.F (Ireland) Limited
- A1 Harvester Limited
- A1 Inflight Staff Agency Ltd
- A1 Labour
- a2z Recruitment Ltd
- A4e Ltd
- Aadept Recruitment Services Ltd
- AAM Staff Ltd
- AAW Contract Services Limited
- Abacus Recruitment and Training Services UK Ltd
- Abbey Forestry
- Abbey Personnel Services Limited
- Abbey Recruitment Services Ltd
- Abby Services
- Abby Services Ltd
- ABC Recruitment Services Ltd
- ABC Recruitment.net Ltd
- Abel Staff Ltd
- Aberdeen University School of Forestry
- Abersenny Ltd
- ABIT Recruitment Ltd
- Absolute Recruitment UK Ltd
- AC 1 Recruitment Ltd
- Accept (Midlands) Ltd
- Access 365 Ltd
- Accounting Secretarial and Personnel Ltd
- Accurate Quality Services Ltd
- Ace Appointments Midlands Ltd
- Ace Personnel
- Ace Recruitment (Leeds) Limited
- ACE Recruitment (Warrington) Limited
- Ace Recruitment Services
- Acer Recruitment Ltd
- Acorn Recruitment (South West) Limited
- Acorn Recruitment Ltd
- Action Contracts East Midlands Ltd
- Active Employment Limited
- Adam Wilson & Sons Ltd
- Adecco UK Limited
- ADM Tempforce Ltd
- ADS Recruitment Ltd
- ADS Recruitment Services Limited
- Adservio Staff Agency Limited
- Advale Associates Ltd
- Advance Personnel Limited
- Advanced Forestry & Garden Services
- Advantage Recruitment Limited
- AEP UK LTD
- Agencja Posrednictwa Pracy Matt-Job
- Agency 2000

- Agentura Pod Von s.r.o
- Agentura Venta, s.r.o.
- AGM Recruitment Ltd
- Agora Recruitment Ltd
- Agrico Workforce Ltd
- Agricultural Labour Services
- Agristaff
- AHW Workforce Ltd
- Aims Recruitment Ltd
- AJ Blatch Trading as
- AKL LTD
- Alan Findlay Ltd
- Alan Firmin Limited
- Alba Trees Plc
- Alban Personnel Ltd
- Albion Services Limited
- Alexander Henderson (Forestry)
- Alexander Sawmills
- Alison Wheeler Associates
- All Aspects Labour
- All Staff Solutions (UK) Limited
- Allan Field Workers
- Alliance Personnel Ltd
- Allied Staff Management Ltd
- Allround Recruitment Solutions Ltd
- All-Temps Recruitment Limited
- Alpha Facilities Management Limited
- Alternative Woodland Management
- AM2PM Recruitment Solutions Ltd
- Ambitions Personnel Ltd
- AMS Services UK Limited
- Andrew Bronwin & Co Ltd
- Andrew Millar Contracts
- Andy Stewart (Forest & Estate Services) Ltd
- Angel Human Resources PLC
- Anglian Woodland Project
- Angus Growers Ltd
- Angus Macdougall
- Animal Aids Ltd
- Anne Hemphill Resources Ltd
- Any Service Bureau Limited
- Anystaff Recruitment Limited
- AOM & Associates
- Apollogroup UK Ltd
- Apple Appointments South West Ltd
- Apple Labour Limited
- Apples and Pears Staffing Agency Ltd
- Aptus Personnel Ltd
- Aquumen Recruitment Group Limited
- Arbor Vitae
- Arboricultural Association
- Arboricultural Association
- Arboriculture & Forestry Advisory Group
- Arbre Energy Ltd
- ARC Woodlands Ltd
- Archshire Ltd
- Ardent Industrial Recruitment Ltd
- Ardworkers Agency Limited
- Armour Recruitment Ltd
- Arsara Ltd
- AS Rodgers (Kirkton) Ltd
- ASA International Ltd
- ASAP Recruitment (UK) Limited
- ASC Connections (Holdings Limited)
- Ashcroft Employment Services Ltd
- Askham Bryan College
- Aspect Forestry & Rural Management
- Aspen Forestry Limited
- Aspen Forestry Services
- Aspire Group
- Associated Employment Services Ltd
- Association of Bakery Ingredient Manufacturers
- Association of Cereal Food Manufacturers (ACFM)
- Association of Labour Providers
- Association of Landscape Management
- Association of National Parks Officers
- Association of Scottish Hardwood Sawmillers
- Aston Services Uk Ltd
- ATJ Industrial Services Limited
- Atlanco Limited
- Atlas Industrial Support Limited

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- ATSL Limited
- Aulina Consulting LTD
- Aven Ltd
- Avi Shnapp Tree Planting
- Aviation Logistical Services Limited
- Aviserv Ltd
- Avon Wildlife Trust
- Aztec Recruitment Ltd
- B & L Recruitment Ltd
- B.J. Unwin Forestry Consultancy
- Backup Staff Limited
- Bailey Employment Services Ltd
- Baileys Recruitment Agency Ltd
- Bailie and Bailie Limited
- Bain Employment Services Ltd
- Baker Harding Recruitment
- Balcas Timber Ltd
- Baltic Services
- Barker And Exley Ltd
- Barker and Pugh Ltd
- Barker Estate Management Ltd
- Barker Ross Ltd
- Barkley Employment Limited
- Barmine Ltd
- Barony College
- Barrow & Grundy (UK) Ltd
- Barry Kilmore
- Barway Services Ltd
- Bawnless Recruitment Ltd
- Baxter Personnel Ltd
- Be Personnel Ltd
- Beam (Wales) Ltd
- Bearwood Associates Ltd
- Beaulieu Contracting
- Beaver Management Services Limited
- Bede Howell Chartered Forester
- Bell Ingram
- Bennett Secretarial Services Ltd
- Department for Business, Enterprise and Regulatory Reform
- Berry Recruitment Limited
- Berrys
- BERWYN LEWIS EDWARDS
- Bidwells
- Bio Forest Consultancy
- BioRegional Development Group
- Birches Consultancy
- Biznus Solutions Limited
- Blue Arrow Ltd
- Blue Mountain Recruitment Ltd
- Blue Water Shellfish Suppliers UK Limited
- Bond Personnel Limited
- Bonser Recruitment Services Limited
- Bookright Employment Ltd
- Border Consultants (Forestry) Ltd
- Borders Area Services Ltd
- Borders College
- Borders Roguing Limited
- BOS Recruitment
- Bosky Trees Ltd
- Bowlts' Chartered Surveyors
- Brae Scotland Ltd
- Braymale T/A NWES Recruitment
- Brecknock Wildlife Trust
- Bridge Contract Services
- Brightwork Ltd
- Britannia Recruitment Ltd
- Brithgwm Woodlands
- British and Irish Hardwoods Improvement Programme
- British Association of Landscape Industries
- British Christmas Tree Growers Association
- British Meat Processors Association
- British Oat & Barley Millers Association
- British Poultry Council
- British Retail Consortium
- British Sandwich Association
- British Soft Drinks Association
- British Starch Industry Association
- British Trust for Conservation Volunteers
- Brook Street UK Limited
- Brooker Farms
- Brooklands Staff Bureau Ltd
- Bryan Massie Woodland Management Ltd

- Bryden Shellfish
- BSG Recruitment Agency
- BSW Timber
- Bucknell Nurseries
- Building Business Bridges Ltd
- Bushley Ltd
- Butchery Solutions Ltd
- C & H Agency
- C B Recruitment Services Ltd
- C E F Recruitment
- C Southerby Poultry Services
- C.R.B. RECRUITMENT
- Cairngorm Forestry and Conservation
- Caledonian Pine Protection
- Cambridgeshire County Council
- Campaign to Protect Rural England
- Campbell & Co Foresters
- Capital Recruitment Services
- Carleton Recruitment Solutions Ltd
- Carlton Business Services Ltd
- Cartwright Employment
- Caspers Agency Ltd
- Castle Personnel (Norfolk) Limited
- Catchwright Poultry Ltd
- Cawdor Forestry
- Cawdor Forestry Ltd
- CC Contractors Ltd
- ccms (2000) ltd
- Celtic 2000
- Celtic Countryside Services
- Central Employment Agency (North East) Ltd
- Century Services (UK) Ltd
- CGS Recruitment Agency Ltd
- Champion Employment Limited
- Charlie Fulton Woodland Services
- Charlton Abbotts Forestry Ltd
- Charnwood Harley Limited
- CIPD
- Chartley Personnel Limited
- Chase Associates Ltd
- Chelmont Labour Supplies Limited
- Chilled Food Association
- Choice Recruitment Limited
- Church Action on Poverty
- Churches Together in Cumbria
- CIP Recruitment Ltd
- City Centre Staff Bureau Ltd
- CJH Farms Limited
- CK Recruitment Specialists Limited
- CKD Galbraith
- Claire Gibson and Associates Ltd
- Clarkes of Bowley
- Class 1 Staff Services
- Classic UK Services Ltd
- Claydens Agriculture Contractors and Factory Operatives
- Clinton Devon Estates
- Cloud 9 Associates Ltd
- Cluttons
- CMD Recruitment Ltd
- CMV Recruitment Ltd
- CNS Recruitment Limited
- Cock of the North Ltd
- Coed Cadw – The Woodland Trust
- Coed Cymru – Monmouthshire County Council
- Coed Cymru, Isle of Anglesey County Council
- Coleg Llysfasi College
- Colin Hay
- Commission for Racial Equality
- Community Forest Secretariat
- Community Forest Secretariat
- Community Woodlands Association
- Complete Recruitment (UK) Ltd
- Complete Recruitment Solutions Ltd
- Concept Recruitment Solutions Limited
- Concept Staffing Ltd
- Concordia Y S V Ltd
- Confederation of Forest Industries
- Confederation of Paper Industries
- ConFor
- Conik Solutions Limited

Annex E

- Connect Personnel Ltd
- Conrac Limited
- Consistent Factory Staff Limited
- Consulting C N
- Contact Industrial Recruitment Ltd
- Contract Options
- Contract Packers LTD
- Contract Personnel Limited
- Contract Support Services Ltd
- Conwy Energy Agency
- Cooper Lomaz Recruitment Limited
- Coppice Association
- Coppice Association
- Cora Recruitment Ltd
- Corepeople Recruitment Ltd
- Council for National Parks
- Country Land & Business Association
- Country Land and Business Association
- Countryside Consultants Ltd
- Cover Recruitment Limited
- Coyle Personnel
- Crest Recruitment Services Limited
- Creyf's (UK) Limited
- Cropcut Produce
- Crown Estate
- Crownwell Recruitment Kent Limited
- Crowther and Johnstone Ltd
- CSC Forest Products (Sterling) Ltd
- CTS Recruitment Ltd
- Cumbria Wildlife Trust
- Cumbria Woodlands
- Curzon Place Recruitment Ltd
- Cutland Contractors
- CV Staff Services Limited
- Cymru Recruitment Ltd
- D & C Labour Supplies Ltd
- D & K Recruitment
- D & T Staff Solutions
- D 1 Labour Services Limited
- D A Wardell Forestry Establishment Contractor
- D Marshall Recruits
- D&V Labour Services Limited
- Daniyal Private Limited
- Daranden Ltd
- Department of Agriculture and Rural Development Northern Ireland
- Darius Binderis
- Darren Harwood Agricultural Services
- Dartmoor National Park Authority
- Databail T/A CSA Recruitment
- David Bell Forestry
- David Goss & Associates
- David Mackie; Forestry Contracting & Advice
- David Nichol Forestry & Landscaping
- David Rice Forestry
- Davida Limited
- DC Recruitment Ltd
- DDL Recruitment Ltd
- DE & MA Morgans Ltd
- Dedicated Employment Services Ltd
- Deepmist Limited
- Defence Estates
- Defra
- Delton Birmingham Ltd
- Deluxe Services Limited
- Denbighshire County Council
- Design Recruitment Associates Limited
- DG Produce Ltd
- DGA Forestry
- Dial-A-Worker Ltd
- Diamond Recruitment
- Direct Labourer Limited
- Direct Recruitment (NE) Ltd
- Direct Response Employment Services
- Direct Staff Construction Limited
- Direct Staff Uk
- Direct Staff Uk Ltd
- Direct Workforce Ltd
- Distribution Support Limited
- DJ Houghton Catching Services Limited
- DJP Poultry Handling Services Limited
- DKM Labour Solutions Limited

- DL & LE Davis
- Draefern Limited
- DRAIG PERSONNEL LTD
- Drake Personnel Ltd
- Driffield Poultry Handling Service
- Drive Rite Support Services Ltd
- Driver Hire Group Services Ltd
- Driverline (GB) Limited
- Driving Edge Ltd
- DSL Workforce
- DTB Recruitment Ltd
- Ducas Ltd
- Duchy of Cornwall
- Duncan Matthews Forestry Contractor
- Dundee Employment and Aftercare Project
- Department for Work and Pensions
- Dysons Poultry Services
- E Campbell Forestry & Agricultural Services
- E+R Solutions Ltd
- Eamonn Wall & Co.
- East Lancashire Services Ltd
- East Northern Services
- East To West Recruitment Limited
- Eastern Sea Fisheries Joint Committee
- Eastwood Forest Services Ltd
- Easyjob (UK) Ltd
- Echo Personnel Ltd
- Eco Tech Ecological Consultancy
- Ecological Tree and Woodland Services
- EcoSylva
- Edinburgh University School of Forestry
- Edystone Ltd
- EDS Recruitment Ltd
- Effective Contracts Limited
- EGGER (UK) Limited
- Egger (UK) Ltd
- El John Services
- ELL Recruitment Limited
- Elmwood College
- ELS Recruitment Ltd
- EMP Solutions Ltd
- EMP Solutions Ltd
- Empire World Trade
- Employ EURO LTD
- Employment Of London Limited
- Encore Personnel Services Limited
- Engage Appointments Limited
- English Heritage
- English National Park Authorities' Association
- Enterprise Personnel Ltd
- Environment Systems
- Environmental Advice Centre Ltd
- Environmental and Landscape Management Services
- Epton Employment Services Limited
- Equality People Limited
- Eric Boyd Forestry Limited
- Eric Boyd Forestry Ltd
- Stanley Duncan & Son
- ES Recruitment Ltd
- Esprit People Ltd
- ESS Employment Limited
- Essential Recruitment & Personnel Limited
- EST Employment Services
- Estate Employment Ltd
- ETCI Ltd
- Ethan Labour Force Limited
- EU Evolution Limited
- Euresource Limited
- Euro Contracts Services Limited
- Euro Labour (Boston) Limited
- Euro Link Schemes (UK) Limited
- Euro Resources Ltd
- Eurofest Ltd
- Euroforest
- Eurokraft
- Europa Personnel Limited
- European Operatives Limited
- Europepeople Limited
- Euroployment Ltd
- Eurostaff
- Eurostaffing Ltd
- Everyday Recruitment Agency Ltd

Annex E

- Evolution Personnel Limited
- EWOS Recruitment Limited
- ExCAL Ltd
- Exchange People Ltd
- Express Staff Limited
- Extra Force Staffing Limited
- Extra Personnel Group Limited
- Extraman Ltd
- Extrastaff Limited
- F E Woodlands
- Faccenda Ltd
- Fairtree Farm
- Fairview Poultry Services
- Farm & Countryside Liaison Services
- Farm Force
- Farm Relief Services Ltd
- Farm Services
- Farmer to Farmer
- Farmers' Union of Wales
- Farming & Wildlife Advisory Group
- Farming & Wildlife Advisory Group, FWAG Cymru
- Farming and Wildlife Advisory Group
- Fast Lane Personnel Limited
- Fast Track Recruitment (London) Ltd
- Fasttrack Personnel Limited
- FBS Woodland Solutions Ltd
- Forestry Commission
- Federation of Bakers
- Federation of Small Businesses
- FFR Ltd
- Field Force GB
- Field Studies Council
- Fieldwork
- Firefox Resources Ltd
- First 4 Labour Limited
- First Call Contract Services Limited
- First Choice Recruitment
- First Choice Selection Services Limited
- First Contact (SW) Ltd
- First Food Services Limited
- First Impression Recruitment Ltd
- First In Hospitality
- First people Recruitment Ltd
- First Recruitment Ltd
- First Recruitment UK Ltd
- Five Star Deployment Limited
- Five Star Recruitment
- Flame Employment (Industrial Ltd)
- Flare Recruitment Ltd
- Flat Cap Forestry Limited
- Flex Employment
- Flex Recruitment Limited
- Flexible Employment Agency
- Flintshire Cockles
- Flintshire Woodlands Ltd
- Flowers Plus
- Focus Staffing Solutions Limited
- Food and Drink Federation
- Forde Recruitment Ltd
- Fordside Ltd
- Forest Enterprise
- Forest Fact
- Forest Garden
- Forest House Partnership
- Forest of Avon
- Forest of Bowland AONB
- Forest of Cardiff Ltd/Treescene Ltd
- Forest of Marston Vale
- Forest of Mercia
- Forester and Arborist Services
- Forestry Business Services (UK) Ltd
- Forestry Commission Wales
- Forestry Contractors Association
- Forestry Services Ltd
- Forscot Limited
- Forward Recruitment
- Fountain Forestry
- Fountain Forestry Ltd
- Fountain Forestry Plc
- Fountains Contracting Ltd
- Fountains Plc
- Fox Resourcing Ltd
- Foxwell Ltd

- FP Contracts Limited
- Fred Bassett & Son
- Fresh Produce Consortium
- Fresh Start Recruitment (UK) Ltd
- Friday Bridge International Farm Camp Ltd
- Friends of the Lake District
- Frontline Recruitment Ltd
- Frozen & Chilled Potato Processors' Association
- Fruitful Ltd
- FSC Enterprises
- Furlong Forest Surveys
- Fusion Personnel Ltd
- Fusion Recruitment Services Ltd
- Fusion Resources Ltd
- Future Forests
- Futures Recruitment Services
- Futurestep Resources Limited
- FWAG Cymru
- Fyfe Forestry
- G A Lloyd
- G L Labour
- G M Contracts
- G M Recruitment Agency Ltd
- G M's (Slough) Ltd
- G P Recruitment Ltd
- G Valued Ltd
- G.A.P. Recruitment
- G.R.Mckenna
- GA Recruitment Limited
- Galaxy Personnel Ltd
- Gallagher Contracts
- Galloway Forest Conservation
- Gap Personnel Holdings Limited
- Gateway Recruitment Services
- GB Resourcing (UK) LTD
- GD(2000) LTD
- Geest Bourne Salads
- Geest Dips & Dressings (Main Site)
- Gemini Resourcing (UK) Ltd
- Genesis Supply Solutions
- geoff stone forestry ltd
- Georgian Recruitment Services Limited
- G-Force Employment Services LTD
- Gill Cooke Personnel Ltd
- Global Temps Ltd
- Globus Services (UK) Limited
- Glyn Lloyd Forestry Contractor
- GMB
- Gold Recruitment Limited
- Golden Transfer Personnel
- Goldline Express Limited
- Goldstock Poultry Services
- Goldteam Recruitment Limited
- Goose Recruit Ltd
- Gordon MacFarlane Ltd
- Gospodarka Lesna, Szkolkarstwo Lesne, Sprzedaz Detaliczna
- Gourmet Personnel Limited
- Grafton Recruitment Ltd
- Grant Caswell Forestry
- Grapevine Corporate Limited
- Gravity Personnel
- Great North Forest
- Great Western Community Forest
- Green Park Consultants Limited Oddzial W Polsce
- Green Wood Centre
- Greenland Contractors
- Greenwood Community Forest
- Griffin Recruitment Limited
- Griffiths Forestry Associates Ltd
- Groundwork
- Growing Heart Workers Co-operative
- Gurkha's UK Limited (the)
- Gwenyn A Choed
- Gypsy Employment Agency Ltd
- H A Snell & Sons
- H C Recruitment Ltd
- H.S.H Agriculture Contractors
- H2 Contracts Ltd
- Habitat Matters Ltd
- Habitat Practice
- Hades Limited

Annex E

- Hammond Forestry & Arboriculture
- Hans Personnel Ltd
- HAP Recruitment Agency Ltd
- Hardcastle Associates Ltd
- Harris Brothers (Bromyard) Ltd
- Hastings & Co
- Haven Employment & Training Limited
- Hawkeswood Ecology
- Hayes Staff Recruitment Limited
- Heads Recruitment Limited
- Health Food Manufacturers' Association
- Helping Hand Asset Management Limited
- He-Man Personnel
- Heta S V
- Hexagon Recruitment Services Ltd
- High Class Recruitment Limited
- Highfield Forestry Ltd
- Highland Agricultural Labour Services Limited
- Highland Birchwoods
- Highland Employment Services Limited
- Highland Forestry Services Ltd
- Hire Staff 4 U Ltd
- HMRC
- Holecroft Ltd
- Home Office
- Hope International Recruitment Services Limited
- HOPS Labour Solutions part of NFYFC
- Horizon Recruitment plc
- Horticultural Trades Association
- Howes Percival Ltd
- Howie Forest Products
- HR Consultancy
- HR Essentials Ltd
- HR Go (Bishop's Stortford) Ltd
- HR GO (Crawley) Ltd
- HR GO (Doncaster) Ltd
- HR Go (Havant) Ltd
- HR GO (Kent) Ltd
- HR Go (Liverpool) Ltd
- HR GO Northampton Limited
- HR GO Nottingham Ltd
- HR Go Sandwell Ltd
- HR Go Wells Ltd
- HR Partners Limited
- HR Services
- HRGO (Great Yarmouth) Limited
- HRGO Newcastle Ltd
- HRGO Norwich LTD
- HRGO Preston
- HRGO Stockport Limited
- HS Recruitment Ltd
- Health & Safety Executive
- Hugh McGregor
- Hugh Wheeldon & Co
- Human Factor Solutions Limited
- Hunsley Conservation
- Hunter Skill Recruitment Ltd
- Hunters Solutions Ltd
- Hutton Landscape & Forestry Services
- I & P Management Services Limited
- Ian Smith Agricultural Contractor
- ICDS recruitment (UK) Ltd
- Ice Cream Alliance
- Ice Cream Federation
- Icon Personnel Solutions Ltd
- Ideal Ventures Limited
- International Exchange Programme UK Ltd
- Iggesund Paperboard Ltd
- IJ Labour
- Impact Labour Limited
- Impact Personnel Solutions Limited
- Impact Recruitment Ltd
- Imperial-Agenja Posrednictwa i Usług Bartosz Chojnacki
- Improva Ltd
- Inca Recruitment Ltd
- Independent
- Industria Personnel Services Ltd
- Industrial Staffing Solutions Ltd
- Industrial Temps Ltd
- Industry Resource Services Ltd
- Infant and Dietetic Food Association

- Infinity HR Limited
- Insight Consulting
- Institute of Chartered Foresters
- Institute of Occupational Safety and Health
- Institute of Water and Environment
- Insurgo Consulting Limited
- Integrity Plus Ltd
- Inter Continental Labour Ltd
- Interaction Recruitment PLC
- INTERRecruit (GB) LTD
- INTERRecruit (uk) LTD
- Interim Recruitment Ltd
- Interlet Limited
- INTERNATIONAL AGRICULTURAL EXCHANGE ASSOCIATION
- International Recruitment Centre
- International Tree Foundation
- IWONA Services Ltd
- J & R Forestry Services
- J Cordiner & Son Ltd
- J E & C Swift (Treework)
- J E Bain
- J E Jones Forestry and Agricultural Contractor
- J E T and S L George
- J Johnstone Forestry Contractor
- J K Employment
- J Kirkwood
- J Lloyd
- J P Services
- J Pilawski – Revolution Nursery Contractors
- J S C “Pasaulio Krastas”
- J S Morris Agricultural Contractors
- J T Industrial Services Ltd
- J Ward
- J.T. Friskney Ltd
- JadePark Industrial Limited
- James Callander & Son Limited
- James Jones & Sons Ltd
- Jann UK Limited
- JARK Recruitment Ltd
- Jasper Corporation Ltd
- Javelin Recruitment Ltd
- Jayko
- Jigsaw Recruitment Limited
- Jigsaw Staff Recruitment S W Ltd
- Job Done (Leeds) Ltd
- Job Link (Soham) Ltd
- Job Shop Recruitment Services SW Ltd
- Jobcorp Ltd
- Jobs 4 E U Ltd
- Jobsearch North West Limited
- Joe Carter Limited
- John Clegg Consulting Ltd
- John Lee Packing Services
- Johnston Accounting Services
- Jonas Handling Limited
- Jones and Jones
- Jones Peckover
- JP Day t/a Harpur Contract Recruitment
- JP Recruitment Ltd
- JPM Labour Services Ltd
- JR & JD Smith
- JSD Recruitment Services Ltd
- JT Recruit Limited
- Just Ecology
- JW Associates
- K & L Poultry Services Limited
- K & M McCabe
- K T 1 Labour Recruitment Ltd
- K2 Recruitment Ltd
- KAB Labour
- Katie Rawlinson
- KBM Foodstaff Ltd
- Kea Trading Ltd
- Keith Grimes Ltd
- Kelly Services (UK) Limited
- Kent Gurkha Company Ltd
- Kent Recruitment Limited
- Kent Staff Services 2000 Limited
- Kernow Labour Ltd
- Kernow Recruitment (Launceston) Ltd
- Kettle Ltd
- Kettle Produce Ltd

Annex E

- Kevin Doughty
- Kevin Harrold Contracts Ltd
- Key Appointments North West Ltd
- Key Recruitment Ltd
- Keyo Agricultural Services Ltd
- KHS Personnel Ltd
- Kiloforce Ltd
- Kinetic plc
- Kingfisher Seafoods Limited
- Kingston Facilities Management Ltd
- Kirton Agricultural Services Limited
- Kirton Labour Supply Ltd
- Knipe Contracts Ltd
- Kool Runnin Ltd
- KPJ Design & Draughting Ltd
- Kristinos Mazeikienes firma
- Kwik Corporation Limited
- L & G Forestry
- L A Union Limited
- L Bienfait Harvesting
- L F UK Recruitment Services Ltd
- L S Recruitment
- La Gente Recruitment Ltd
- LABAS Recruitment
- Labour Direct
- Labour hire
- Labour Ready Temporary Services UK Ltd
- Labour Relief Ltd
- Labour Source Limited
- Labourforce
- Labourforce Solutions Ltd
- Labourpool UK Limited
- Lake District National Park Authority
- Lamyman Grange Contractors
- Land Access and Recreation Association (LARA)
- Land Management Solutions Limited
- Land Restoration Trust
- Land Use Consultants
- Langham Recruitment (UK) Ltd
- Lanos Ltd
- LANTRA
- Lantra Landscape
- Lauras Gang
- Laurent Bienfait Harvesting
- Lawlor & Associates Recruitment Limited
- Linking Environment and Farming (LEAF)
- Leda & Co (Northern) LTD
- Lee Hill Contracting
- Leisure Recruit Ltd
- Liam Stuart
- Libra Recruitment Agency Limited
- Lightyear Recruitment (Wigan) Ltd
- Lincolnshire Labour Ltd
- Lincolnshire Machinery Ring Ltd
- Lincolnshire Staff Services
- Linear Recruitment Ltd
- Link Recruitment
- Linklife Limited
- Link-up U K Ltd
- Linx Labour Ltd
- Liquid Recruitment LTD
- List Recruitment (Midlands) Ltd
- LKL Relief Services Ltd
- Llanelli Shellfish 3000 Limited
- LMR Services Ltd
- Local Authority of Coordinators of Regulatory Services
- Local Government Association
- Loch Ness Tree Planters
- Lockhart Garratt Ltd
- Logistics and Manufacturing Recruitment Limited
- LOL Contracts Ltd
- London Staff Bureau Ltd
- Longley Limited
- Lonsdale Forestry Ltd.
- Louise Hewett Recruitment Ltd
- Lovelace Recruitment Limited
- Lowther Forestry Group Ltd
- LSJ Agencja Pracy sp. z o.o.
- LSN Services Ltd
- Lukas Labour Agency
- Lusostaff Ltd

- M & M Agri Staff
- M & M Farm Services
- M A S Recruitment
- M C Personnel Limited
- M C Services Leicester Limited
- M G & J A Vines
- M I Johnson Ltd
- M J Hague (Extrastaff) Ltd
- M K Personnel Solutions Ltd
- M M Agriculture Contractors
- M M Fencing Limited
- M MacPherson Contractor
- M P A Recruitment
- M S Agricultural Services Ltd
- M Smith Agricultural Labour Services
- M&M Workforce Limited
- M. K. Distributers Limited
- M.F. Warman
- Macaulay Land Use Research Institute (MLURI)
- Mach Ltd
- Magian Ltd
- Mainline Employment Ltd
- Major Recruitment Ltd
- Malcolm McLarty Forestry Contractor
- MAM Contracting Ltd
- Management Recruitment Consultants
- Manpower UK Ltd
- March Recruitment Bureau Limited
- Marches Woodland Initiative
- Marcus Cowling Labour Services Ltd.
- Margaret Hodge Recruitment Ltd
- Margarine and Spreads Association
- Maria Recruitment Solutions Limited
- Mark Lawton Ltd
- Mark Skipworth Agricultural Contractor
- Marton Recruitment Limited
- Maureen Lynn Recruitment Ltd
- Maximum Recruitment Agency
- Maxwell Bruce Ltd
- Mayday Employment Limited
- Mayfair Recruitment Bureau Limited
- McCartneys LLP
- MCK Labour
- MCN Recruitment Ltd.
- MDR Staffing Ltd
- Mearns & Angus Services Ltd
- Meat and Livestock Commission
- Melrose Forestry
- Melville Agricultural Contractors Limited
- Melville Contractors Limited
- Mencap
- Mercury Personnel Solutions Ltd
- Meridian Business Support Limited
- Mersey Forest
- Meyer Scott Recruitment
- MHS Labour Services
- Michael Todd Forestry Contracts
- Midland Labour Supplies Limited
- Miles Recruitment Limited
- Miller Land Management
- Moat Recruitment Ltd
- Monitor Hygiene Services Ltd
- Monitor Services Ltd
- Montgomeryshire Wildlife Trust
- Moore & Burrell Ltd
- Moss Staffing Ltd
- Mostyn Estates Ltd
- Mountains of Boston Ltd.
- MPC CZ Ltd
- MPES Labour Agency
- Mploy Staffing Solutions Ltd
- Mr Desmond Lee Patterson
- MTrec Ltd
- Mushroom Growers Association
- MWB Recruitment Ltd
- Mynydd Timber Service Ltd
- N & A Ammar
- N Hall-Gardiner Forestry Services
- N V Gang Work
- N&W Mack Ltd
- Napier Recruitment Ltd
- NAS Recruitment Services (Scotland) Ltd

Annex E

- National Association of Agricultural Contractors
- National Association of British & Irish Millers
- National Association of Citizens Advice Bureau
- National Association of Master Bakers
- National Association of Tree Officers
- National Farmers Union
- National Farmers Union of Scotland
- National Forest Company
- National Pig Association
- National School of Forestry
- National Urban Forestry Unit
- ND Crowhurst Transport Limited
- NE Tree Company
- NE Woodlands
- Neaves & Neat Employment Services Ltd
- New Beginnings Corby Ltd
- New European Staff .com
- New Farm Produce
- New Farm Produce Ltd
- New Personnel Network
- Newtex Ltd
- Newtex UK Limited
- Newton Employment Limited
- Next Step Recruitment Ltd
- Nexus Personnel Ltd
- NFU of Wales
- NFU Scotland
- Nick Okseniuk
- Nicks Recruitment Services Ltd
- Norbord Ltd
- North & South Recruitment Limited
- North East Community Forests
- North East Workforce Ltd
- North Highland Forest Trust
- North Kesteven Agricultural Services
- North Western & North Wales Sea Fisheries Committee
- North York Moors National Park Authority
- Northern Employment Services Limited
- Northern Recruitment Group PLC
- Northmoor Trust
- Nova Recruitment Services Ltd
- Nu-Staff Group Limited
- K Private Enterprise Limited
- Oasis Recruitment Group Ltd
- Octavian Recruitment Ltd
- Olympic Staff
- Omega Resource Group Ltd
- On-Call Recruitment Limited
- One Call Recruitment Ltd
- One on One Recruitment Ltd
- Online Personnel Solutions Ltd
- Opiecare Services Limited
- Opus Agencies Ltd
- Orbital Recruitment (Derby) Limited
- Organic Food Federation
- Origin Associates Ltd
- Orion Engineering Services Limited
- Orkney Business Ring – Labour Agency Ltd
- Orton Park Recruitment Services
- Osmond Coote Martin Ltd
- OSR Recruitment Services
- Osrodek Pozaszkolnej Nauki Jezykow Obcych, Usl. Lingwistycznych
- OTTO Work Force Limited
- Owen Payne Recruitment Services Ltd
- OZ Recruitment
- P & L C Fendyke
- P & M Groundworks Limited
- P A G Recruitment Ltd
- P C Jackson
- P G Agricultural Ltd
- P H U Norbik
- P K R Contract Services
- P M R Direct Ltd
- P S Employment
- P. J. Massam Agricultural Services
- P. Wood Catching Services Ltd
- P.D.S.
- Paisley Secretarial Services
- Paradise Solutions Ltd
- Paramount Personnel Limited

- Paramount Recruitment (Wales) Ltd
- Parc Newydd
- Paris Services Limited
- Park Royal Workforce Limited
- Parkhouse Personnel Limited
- Partners Employment European Recruitment Ltd
- Partners Employment Services Limited
- Pat McSorley Forestry Contractor
- Patrick Frazer & Son Ltd
- PCS (Campden Ltd)
- Pembrokeshire Coast NPA
- Pendle Personnel Limited
- Penrose Personnel Ltd
- People Direct
- People People Recruitment
- People Plus Recruitment Limited
- Peopleforwork Limited
- Perinet Limited
- Permatemp Limited
- Personnel In Europe
- Personnel Plus Recruitment Limited
- Personnel Selection Associates Limited
- Pertemps Recruitment Partnership Ltd
- Pertemps Scotland Limited
- Pertemps South West
- Pet Food Manufacturers Association
- Peter Smith Recruitment Limited
- Philip Ferguson MRICS
- Phoenix Property (Scotland) Ltd
- Piccadilly Workforce Limited
- Pilot Sp. z o.o.
- Pinkmead Farm
- Piper Associates Ltd
- Piper X Limited
- PJJ Recruitment
- Place Them
- Plain Recruitment Limited
- Plas Muriau Woodlands
- Plus One Personnel Ltd
- PMP Recruitment
- Point Professional Recruitment Ltd
- Polana sp. z o.o.
- Poleposition Recruitment UK Limited
- Police Superintendents Association
- Polish Connection Limited
- Polish Workforce (UK) limited
- Polished Multitask Agency Ltd
- Pol-UK Recruitment Ltd.
- Poplar Tree Company
- Positive Solutions Recruitment
- Postmodern Recruitment
- Poul's Gang
- Poultry Catchers Ltd
- Poultry Division Ltd
- Poultry Handling Services Ltd
- Poultry Services Limited
- Powerforce Contract Support Services Ltd
- Powerstaff Recruitment Limited
- Powys County Council
- Premier Employment Ltd
- Premier Network Resources Limited
- Premier Placement Services Limited
- Premier Recruitment Ltd
- Premier Recruitment Solutions
- Premier Work Support
- Premiere Employment Group Limited
- Premium People Ltd
- Pre-packed Flour Association
- Prepared Fish Products Association
- Prestige Recruitment Ltd
- Prestige Recruitment Specialists Ltd
- Prestons of Sleaford Ltd
- Pride Management Service Limited
- Prime Appointments Ltd
- Prime Staff Services Limited
- Prime Time Recruitment Limited
- Primeval Ltd
- Pro Driver Services Ltd
- Pro Personnel
- Proactive Personnel (West Midlands) Ltd.
- Proactive Personnel Ltd.
- Proactive Recruitment Ltd
- Processed Vegetable Growers Association

Annex E

- Prochoice Recruitment Limited
- Production Line Recruitment Agency Ltd
- Profile (SE) Ltd
- Pro-Force Ltd
- Project Scotland Volunteers
- Pryor & Rickett Silviculture Ltd
- PTE UK Limited
- Pure Recruitment Solutions
- QAS Copak Ltd
- QLS Management Ltd
- QTR Services Ltd.
- Quality Contract Personnel Ltd.
- Quality Personnel Ltd
- Qualitycourse Limited
- Qubic Recruitment Solutions Ltd
- Quest Employment Ltd
- Quick Recruitment Ltd
- R & I Limited
- R & J M Place LTD
- R E Personnel Limited
- R H & D H Allan
- R N Agricultural Services Ltd
- R P Employment Agency Ltd
- R S Landscaping Ltd
- R S Recruitment Limited
- R Saunders Forestry Contractor
- R&G Services Ltd
- Radnorshire Wildlife Trust
- Ramsak Ltd
- Ramsgate Consultants Ltd
- Randstad Employment Bureau Limited
- Rania Farm Services Limited
- Rapid Employment and Recruitment Ltd
- Rapid Personnel Ltd
- Rapid Recruit Ltd
- Rapier Recruitment Ltd
- Ray Turner Labour Ltd
- Rayment Recruitment Ltd
- Raymond-Barker & Co
- RDT Woodlands East Ltd
- React Recruitment Ltd
- React Staffing Agency
- Reaction Employment Ltd.
- Real Recruitment Partnership Ltd
- REC
- Recroot Ltd
- Recruit Employment Services
- Recruit Solutions (UK) Ltd
- Recruiting Solutions (East Midlands) Ltd
- Recruitment Holdings Limited
- Recruitment Prospects Limited
- Recruitment Solutions (South West) Ltd
- Recruitment Solutions Wales Ltd
- Recruitment South West Ltd
- Recruitmentfinder Limited
- Red Berry Recruitment Ltd
- Red Eagle Ltd
- Red Recruitment 24/7 Ltd
- Red Rock Forestry
- Red Rock On Site Services L L P
- Red Rose Community Forest
- Redwood Resources Limited
- Reed Employment
- Rees Richards and Partners Chartered Surveyors
- Reforesting Scotland
- Reids Poultry Transport Limited
- Relay (holdings) Ltd
- Relay Recruitment Group Ltd
- Reliance Employment Ltd
- Remploy
- Renavatio Limited
- Resolve Interim Solutions Limited
- Response Personnel Limited
- Response Recruitment Ltd
- RFC Recruitment Solutions Ltd
- Riada Recruitment Ltd.
- Riccadonna Produce
- Rice Association
- Right Direction (UK) Ltd
- Right Recruitment UK Limited
- Right Staff
- Right4staff Ltd
- Rightspec Recruitment Ltd

- Rimec Contracting Ltd
- Ringlink (Scotland) Ltd
- Ringlink (Scotland) Ltd
- Rise Scotland Ltd
- Riverside Recruitment Ltd
- Riverside Recruitment(UK) Ltd
- RJ Recruitment Services Limited
- Roadhogs
- Rob Marsh Woodland Services
- Robert Dare (forestry)
- Robert McCrindle (Forestry Contractor)
- Roberto Mac Ltd
- Rolfe Resources Ltd
- Rosegar Limited
- Rotherwood Recruitment LLP
- Royal Agricultural College
- Royal Institute of Chartered Surveyors
- Royal Scottish Forestry Society (RSFS)
- Royal Society for the Protection of Birds
- RSS (Wessex) Ltd
- RTS Ltd
- Rullion Personnel Services Limited
- Rural Development Initiatives
- Rural Development Services Ltd
- Rural Group of Churches Together in England
- Rutledge Recruitment and Training Ltd
- Ryan Careers Ltd
- S & A Poultry's
- S & A Produce (UK) Ltd
- S & J McCurry Limited
- S A Poultry Services
- S C Access U K Employment S R L
- S E B I Recruitment Limited
- S F C Personnel Limited
- S G M Recruitment Limited
- S I A "Jauniesu un studentu starptautiska informācijas un nodarb
- S J C Recruitment Ltd
- S J Services (UK) Ltd
- S L R Poultry Limited
- S M S Ipswich Ltd
- S.A.M. Recruitment Limited
- SAC (Scottish Agricultural College)
- Salamandra Ture Ltd
- Sales Staff Uk Ltd
- Salt Manufacturers Association
- Samclean Services Ltd
- SAOS Ltd
- Saph-Hire Agency Ltd
- Sapphire Lee
- Sapphire Trading Ltd
- SASTAK
- Sastak Services Ltd
- Satchwell Associates Limited
- Savills
- Saviour Recruitment Ltd
- Sayer-Martin Ltd
- SC Good Work Solutions SRL
- SC Lanerock Corporate S R L
- Scantec Personnel Ltd
- Scott Murdoch Arran Footpaths
- Scottish Agricultural Organisation Society
- Scottish Bedding Plant Association
- Scottish Food and Drink Federation
- Scottish Machinery Ring Association
- Scottish School of Forestry
- Scottish Seafood Processors Federation
- Scottish Woodlands
- Scottish Woodlands Ltd
- Sea Fish Industry Authority
- Seafood Shetland
- Sean Fletcher Forestry Contractor
- Search Consultancy Limited
- Seed Crushers' & Oil Processors' Association
- Selby Boatman Services Ltd
- Selective Recruitment Ltd
- Senate Recruitment Solutions Ltd
- SES Recruitment Consultants Ltd
- Seven Star Recruitment Ltd
- Sharp Industrial Flexible Staffing Solutions Ltd
- Shellfish Association of Great Britain

Annex E

- Shire Employment Limited
- Shorterm Engineers Ltd
- Shropshire Group
- Sica Agency
- Silverline Europa Ltd
- Simply Outsourcing Services limited
- Simply Recruit Ltd
- Skills & Labour Limited
- Skillsco U K Ltd
- Sky Personnel Ltd
- Slender Contracting Ltd
- SLS Services Limited
- Small Farms Association
- Small Woods Association
- Smart Solutions (Recruitment) Ltd
- Smarter Recruitment Limited
- Smiths Gore
- Snowdonia National Park Authority
- Soil Association
- Soma Recruitment Ltd
- SOS Recruitment Consultancy Ltd
- Source Recruitment Limited
- South Devon Organic Producers Ltd
- South Hams Workforce Limited
- South West Forest
- South West Recruitment Ltd
- South Yorkshire Forest
- Southampton Recruitment Solutions Ltd
- Southern Silviculture
- Spectrum Personnel Ltd
- Spinnaker Recruitment
- Spring Personnel
- SRP Personnel Ltd
- SRS Recruitment Ltd
- Staff 2 Work Ltd
- Staff Box Recruitment Ltd
- Staff Finders (UK) Ltd
- Staff Select Ltd
- Staffflex Limited
- Staffline Recruitment Ltd
- Stafforce Personnel Ltd
- Staffpoint Temp Staff Ltd
- Staffsign (Bradford) Limited
- Staffsmart UK Ltd
- Staff-U-Like Limited
- Staff-Vader Ltd
- Staffwise Holdings Plc
- Staggar Recruitment
- Star Work Force Limited
- Steelend Contracts Ltd
- Stephen Colhoun Limited
- Steve Wright (Poultry) Limited
- Stewart Gardening Services
- Stonehouse Recruitment Ltd
- Stonetouch Ltd
- Storm Personnel Services Ltd
- Storm Recruitment Ltd
- Stour Valley Group Ltd
- Stratec Business Contracts Ltd
- Strutt & Parker
- STUC
- Sudnik Employment Agency
- Sue's Land Services Ltd
- Suffolk Recruitment Limited
- Summer Job Ltd
- Sunrise East Ltd
- Sunrise Solutions UK.com Ltd
- Supertroopers Recruitment
- Supreme Staff Ltd
- Supreme Workforce Ltd
- Sure Staff Recruitment Limited
- Surestaff Recruitment
- Sustainable Forest Management
- Swann Personnel Limited
- Swanstaff Recruitment Limited
- Swift Recruitment (eastern) Limited
- Swift Recruitment Solutions
- Sylvan Resources Ltd
- Sylvascape
- Sylvestrus Limited
- System Recruitment (Carlisle) Ltd
- T G T Solutions
- T H Brown Ltd
- T H Clements & Son Ltd

- T. Ruck Agricultural Labour Suppliers Ltd
- TA Gangmasters Limited
- Taber Recruitment Services Limited
- Tailor-Made Temps Ltd
- Talisdale Ltd
- Taskmaster Resources Ltd
- Taurus Recruitment Limited
- Tayforth Machinery Ring
- Taylor Gordon & Co Ltd
- Taylor Made Services
- Taylor Made Services UK Limited
- Taylor's Poultry Services
- Team Support Services Ltd
- Team Support Services Plc
- Teamwork LLC Ltd
- Teamwork Resource Limited
- Teamwork Selection Ltd
- Tees Forest
- Temp Recruitment Ltd
- Tempco Staffing Ltd
- Templine Employment Agency
- Temploy Recruitment Services Limited
- Temps Direct
- Temps Direct 24/7 Ltd
- Temps Ltd
- Temp-Team Limited
- Tenant Farmers Association
- Tennants (Elgin) Ltd
- TFR Ltd
- Thames Chase Community Forest
- The Best Connection Group Ltd
- The Biscuit, Cake, Chocolate and Confectionery Association
- The Buccleuch Estates Limited
- The Church of England Archbishops' Council
- The Edge Recruitment Cafes Ltd
- The Employment Corporation Ltd
- The Game Conservancy Trust
- The Industrial Work Solutions Ltd
- The Labour Bureau
- The National Association of AONBs
- The National Edible Oil Distributors' Association
- The National Forest Company
- The National Trust
- The Paterson Group
- The Personnel People
- The Pink Corporation
- The Royal Forestry Society
- The Royal Forestry Society
- The Royal Horticultural Society
- The Scottish Executive
- The Silvanus Trust
- The Solway Shellfish Management Association
- The Superior Service Co Ltd
- The Welsh Assembly Government
- The Wildlife Trusts
- The Wise Agency Ltd
- The Woodland Stewardship Company Ltd
- The Woodland Trust
- The Woodland Trust
- The Woodland Trust
- The Workers Agency
- The Workshop (Wisbech) Ltd
- There For Recruitment
- Thomas Whittle Contracts Limited
- Thorn Baker Ltd
- Thornlands Gangmasters Limited
- Thorns Workforce Ltd
- Three Way Solutions Ltd
- Tilhill Economic Forestry
- Tilhill Forestry
- Tim Lewis Consultancy Ltd
- Tim Lewis Recruitment Ltd
- Timber Trade Federation
- Timberland Homes Ltd
- Time Recruitment Solutions Ltd
- Toad Hill Ltd
- Todorov & Co Limited
- Tony Housley
- Top Banana Recruitment Agency
- Top Gear Recruitment

Annex E

- Top UK Ltd
- Top Up Personnel Ltd
- Topstaff Employment Ltd
- Toryen Ltd
- Total Catering Solutions Recruitment Ltd
- Total Employment Ltd
- Total Healthcare Ltd
- Total Labour Solutions
- Total Quality Staff Ltd
- Total Recruitment (Scotland) Limited
- Trade Recruitment (Eastern) Limited
- Trades Union Congress
- Trak Employment Solutions Limited
- Travail Employment Group Ltd
- Tree Council
- Tree-Tec
- Tre-Newydd Estates
- Trevor Paul Hanson
- Triangle Recruitment Ltd
- Triplenine Recruitment Ltd
- TRS Personnel Limited
- TS Developments Ltd
- Tuckwitts' Tea + Toast Ltd
- Tudor Employment Agency Ltd
- Turnaround Staff Ltd
- Turner Stubbs Limited
- Twenty-Four Seven Industrial Recruitment Ltd
- Twenty-Four Seven Recruitment Services Ltd
- Two Chips Limited
- UAB Grand Turas
- UCATT Scottish Region
- UK Association of Frozen Food Producers
- UK Association of Manufacturers of Bakers' Yeast
- UK Labour Ltd
- UK Recruitment Agency
- UK Timber Frame Association
- UK Vineyards Association
- UKFPA
- Ultimate Innovations (Oxford) Limited
- Unite
- United Employment Ltd
- United Kingdom Forest Products Association (UKFPA)
- United Labour Limited
- United Recruitment Services Ltd
- United Workforce UK
- Universal Personnel (East Anglia) Ltd
- Universal Recruitment Solutions Limited
- University of Cambridge Institute for Manufacturing
- Uniwork
- Up & Working Limited
- Uplands Recruitment Agency Ltd
- UPM Kymmene UK Ltd Caledonian Paper
- USDAW
- Vale of Glamorgan council
- Vane Limited
- vanStomp
- Velcourt Ltd
- Victor Foster Poultry Contracts Ltd.
- Victor Wolf Limited
- Vines Bros Ltd
- Vital Recruitment (Peterborough) Ltd
- Vital Recruitment (UK) Ltd
- VJE Employment
- Voluntary People Limited
- W H Recruitment Limited
- W Shorthouse Forestry Contractor
- Weir Forestry
- Westaff (UK) Ltd
- Westcoast Environmental
- Westgate Recruitment Ltd.
- Westray Recruitment Consultants Ltd
- WFM Labour Services Limited
- Whitelands Environmental Mediation
- Whitewoods
- Wilcock Agricultural Ltd
- Wild Recruitment
- Wildlife & Countryside Services
- Wildways
- Wildwood Consulting
- William McCormick

- Williams Labour Services Ltd
- Will-Power U K Ltd
- Windymains Sawmill Ltd
- Wingate Preston Ltd
- Winners Personnel Limited
- Wise Employment (Swindon) Limited
- WMS Recruitment Ltd
- Women's Food and Farming Union
- wood.for good limited
- Woodland Improvement Ltd
- Woodland Trust
- Work Force Plus (UK) Ltd
- Work With Us Limited
- Workers Limited
- Workflex Limited
- Workforce Consultants Ltd.
- Workforce Recruitment (NW) Ltd
- Workmates Premier Limited
- Workplace Ltd
- WR Industrial Ltd
- Wrekin Recruitment Ltd
- Wright Employment Limited
- Wullzer Ltd
- www.wowo.co.uk
- Wykeham Staff Services
- Wykeham Staff Services
- Xtrawork Ltd
- Yorkshire Repak Ltd
- Yourstaff
- Zenith Recruitment Ltd
- Zoneday Recruitment Ltd
- Zumark
- 62 private individuals and individuals who trade in their own names

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