Briefing Note: Changes to Immigration Rules affecting UK Seafood Sector

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Summary

- ✓ **The new policy is taking effect from 22nd of July 2025**
- ✓ **Increase of Skilled Worker visa salary threshold from £38,700 to £41,700**
- ✓ **Immigration Salary List will be phased out by 31st of December 2026**
- ✓ **Qualification requirements for Skilled Worker visa will rise to RQF 6**
- ✓ **Job code - 5433 Fishmongers and poultry dressers; Fishmongers, is being removed from the Immigration Salary List entirely**
- ✓ **Three other job codes associated with seafood industry will remain on the Immigration Salary List until it is phased out on 31 December 2026**
- ✓ **No immediate changes for persons that currently hold SWV**
- ✓ **New Skilled Worker visa holders will not be permitted to bring dependents**

Background

In May 2025, the UK government unveiled a comprehensive overhaul of the immigration system as detailed in the white paper, *Restoring Control over the Immigration System*. Whilst a white paper doesn't change the rules around immigration or change legislation, it makes proposals for changes the government intends to implement in the future and the reasons why. In this case, the white paper proposed changes to the Skilled Worker visa to make it harder to move to and settle in the UK, with a view to reducing net immigration.

On 01 July 2025, the government announced that the home office would begin to implement some of the changes, and the first changes to the immigration rules were laid. These will take effect from 22nd July 2025.

What changes are taking effect?

Increase in the minimum salary requirement for Skilled Worker visa

The salary threshold will rise further from £38,700 to £41,700 from 22nd July 2025. For occupations that remain on the current Immigration Salary List (ISL), the new salary will be £33,400, previously £30,960.

Abolition of the Immigration Salary List (ISL)

Previously called the Shortage Occupation List, the government will now begin to remove salary discounts for shortage occupations. This is an attempt to ensure that hiring from overseas is not a cheaper alternative to fair domestic wages. The ISL will be phased out by 31st December 2026. With the abolition of the ISL, the salary increase will be steeper for those job roles affected by both the salary threshold rising and the removal of the discount.

Introduction of a Temporary Shortage List

A new time-limited list will allow certain sub-degree roles in critical sectors temporary access to Skilled Work visas, while sector-specific workforce plans are developed. The process will take time to establish, and therefore, in the interim, a Temporary Shortage List will contain occupations that the Migration Advisory Committee (MAC) has recently considered to be in shortage, or which are deemed crucial to deliver on the UK's Industrial Strategy.

Skilled Worker visa qualification threshold

This relates to the skill level required for the occupation and not the qualifications held by a visa applicant. This was previously reduced and set at RQF 3 (*A-level equivalent*), however it will rise to RQF 6 (the previous level). Eligibility will be limited to graduate-level roles, reducing access for lower-skilled jobs and reinforcing the focus on high-value occupations.

> "For occupations with a skills requirement of RQF3-5 (below degree level) where there have been long term shortages, the Government will only permit use of the Points-Based immigration system on a time limited basis where the MAC has advised it is justified, where there is a workforce strategy in place, and where employers seeking to recruit from abroad are committed to playing their part in increasing recruitment from the domestic workforce."

UK Government research briefing highlights that RQF levels 3-5 will not be sponsorable unless the Migration Advisory Committee recommends an exemption and the industry is demonstrating effort to recruit domestically.

Restrictions on dependents

Individuals sponsored in any Skilled Worker visa role on or after 22 July 2025 will not be permitted to bring dependents unless they already hold a Skilled Worker visa.

Transitional provisions for existing employees or current visa holders

Individuals already holding SWV's can renew, change employment, and take supplementary employment under the existing rules, even if their roles are below RQF 6. These transitional arrangements will not be in place indefinitely and will be reviewed in due course.

From 22nd July 2025, any new overseas applicants or those switching from other routes will need to comply with the updated RQF 6 requirement and the new salary thresholds. It is expected that those extending their visa or switching job role may also be affected

depending on the nature of the change, and so clarification should be sought to confirm whether transitional arrangements apply.

What is the impact on Seafood Industry job classifications?

The following Job code is being removed from the immigration salary list entirely:

- 5433 Fishmongers and poultry dressers note elsewhere classified (*specifically Fishmongers and Fish Processing*).

The three remaining job codes relevant to the seafood sector will continue to be listed on the ISL until it is phased out on 31 December 2026. These are:

- 1212: Managers and proprietors in forestry, fishing and related services – including fisheries managers and proprietors, and other related roles not elsewhere classified.
- 5119: Agricultural and fishing trades not elsewhere classified; Fish and river keepers, Fishers, Share fishermen, and similar listed occupations.
- 9119: Fishing and other elementary agriculture occupations not elsewhere classified – specifically including deckhands on large fishing vessels (9metres and above).

What is the position and timeline for other changes?

There are no definitive timelines for the remaining proposals from the white paper to come into force; however, the Home Office has announced that changes to the English language standards and immigration skills charge will be implemented "by the end of this year".

Changes to the English language requirement

The minimum English language level for SWV applicants will rise from B1 (intermediate) to B2 (upper intermediate), and adult dependants of workers will need to meet the A1 (beginner) English language requirement under the Common European Framework.

Increased immigration skills charge

The immigration skills charge (ISC) will see its first increase since 2017, rising by 32% when the implementation date is announced. The cost to businesses will depend on the length of time that a worker's Certificate of Sponsorship is issued for. Based on current rates, the proposed increases are as follows:

- Medium or Large Sponsors: The ISC would rise from £1,000 to £1,320 per sponsored worker per year.
- Small Sponsors: The ISC would increase from £364 to approximately £480 per sponsored worker per year.

These changes are intended to encourage employers to invest in domestic workforce training and discourage reliance on overseas labour. The ISC funding will be used to support skills funding for priority sectors to upskill the domestic workforce and ultimately reduce the reliance on migration.

Extension of settlement qualification period

The minimum residency requirement to apply for settlement in the UK will be extended from five years to ten years under the Points-Based System. Dependents of British citizens will remain subject to a five-year period. The white paper does not set out how these points would be earned. These issues are likely to be covered in the proposed consultation, which has yet to be announced.

The changes do not appear to impact people applying for Settled Status under the European Settlement Scheme after five years of residence in the UK.

Role of the Migration Advisory Committee

The government will commission the Migration Advisory Committee (MAC) to undertake a thorough review of all roles on the ISL and develop the new Temporary Shortage List. The MAC will therefore review and determine which medium-skilled jobs should be on the temporary list beyond 31 December 2026 before making their recommendations.

Will MPs vote on any white paper proposals?

It is understood that most of the changes can be implemented by "*statements of changes to the immigration rules*". To reject these changes, MP's must approve a motion expressing disapproval of the new rules within 40 days. For context, there was no vote on the previous changes in 2024. Any changes which require primary legislation, *i.e. an act of parliament*, will however, need endorsement of MP's.

What does this mean in the context of the UK seafood sector?

Processing sector

According to the 2024 survey of 197 majority seafood processors across the UK, 38% of processing workers were non-UK nationals. Approximately 14.1% of those were reported to be employed via the SWV route. Other visa routes used include the EU settlement scheme and those for Ukrainian refugees and family dependants. Most are employed in 'factory floor' roles, which are primarily considered as RQF 3 and would therefore not be eligible for SWV's.

When asked about access to labour, 42% of 288 sites surveyed (*representing 48% of employees*) rated their access to sufficiently skilled labour as *bad* or *very bad*.

Catching sector

Several recent 'Employment in the UK Fishing Fleet' reports have highlighted that the UK catching sector is reliant on non-domestic labour. According to the 2021 and 2024 Fleet social survey results 29-55% of deckhands and 21-36% of engineers are non-UK nationals. This is particularly true for fleets operating beyond territorial waters (12nm) and vessels over 10m.

Due to changes introduced in 2023, a transit visa is no longer suitable for individuals carrying out work within the UK's 12 nautical mile territorial waters, as this now requires specific immigration permission that includes the right to work. As a result, many employers have switched to using the Skilled Worker visa route to employ foreign crew.

In the 2024 Seafish fleet survey, vessel owners were asked about the availability of sufficiently skilled labour. Of the 525 skippers and owners who responded, 57% of the sample rated their access to labour as *bad* or *very bad*, confirming the persistent challenges in employing new crew members.

There are also clear regional and fleet-specific differences. In Northern Ireland, 83% of respondents rated their access to labour as *bad* or *very bad*. Similarly, 67-69% rated it negatively in scallop dredging and Nephrops trawling fleets that mainly supply the domestic scampi market and export Nephrops and scallops.

Concluding remarks

The immigration reforms mark a significant shift in the UK's approach to labour supply, with a clear emphasis on reducing reliance on migrant workers and strengthening the domestic workforce. For the seafood sector, which is already facing acute labour shortages, these changes present both challenges and a pressing need to adapt. Whilst the timeline for further changes remains unconfirmed, it is advisable that employers should begin planning now to ensure compliance and workforce resilience in the face of tightening immigration rules.

Given the growing constraints on both domestic and international labour supply, businesses should now factor long-term workforce uncertainty into their strategic planning. They should also consider how they can contribute to the development of a workforce strategy that supports not only their own operations, but also the wider seafood industry and UK economy, recognising the significant and continued economic value the sector delivers.

Link to policy papers and technical annex

1. Policy Paper: Restoring control over the immigration system: white paper – 12 May 2025. https://www.gov.uk/government/publications/restoring-control-over-the-immigration-system-white-paper
2. News Story: Major immigration reforms delivered to restore order and control – 01 July 2025. https://www.gov.uk/government/news/major-immigration-reforms-delivered-to-restore-order-and-control
3. Statement of Change in Immigration Rules – 1st July 2025. https://assets.publishing.service.gov.uk/media/6863a3ea08bf2f5376121a67/E03394848_-_HC_997_-_Immigration_Rules_Changes__Print_Ready_.pdf
4. Explanatory memorandum to the statement of change to the Immigration Rules: HC 997 – 01 July 2025. https://www.gov.uk/government/publications/statement-of-changes-to-the-immigration-rules-hc-997-1-july-2025/explanatory-memorandum-to-the-statement-of-changes-to-the-immigration-rules-hc-997-1-july-2025-accessible
5. Changes to UK visa and settlement rules after the 2025 immigration white paper – 03 July 2025. https://commonslibrary.parliament.uk/research-briefings/cbp-10267/