

13th September 2012

Mr Robin Webb
Low Pay Commission
6th Floor
Victoria House
Southampton Row
London
WC1B 4AD

Dear Mr Webb

Consultation on National Minimum Wage – Accommodation Offset

British Growers Association represents a wide range of producers of horticultural crops in the UK, across all sectors, and particularly growers of Salads and Vegetables. As such, our members' businesses employ a vast range and number of seasonal and permanent workers, well over 30,000 in total.

We would like to provide a perspective, as expressed throughout the industry, around the accommodation offset. The weekly limit will rise to £33.74 from October 2012. Whilst we recognise the purpose of this as a protective measure, we do believe that there are limitations to this capped approach.

Employers recognise the value of a motivated and comfortable workforce. In reality, the cap is set too low to provide accommodation conditions and facilities that are good enough to create such a relationship between employer and employee. This leads to two scenarios, neither of which are satisfactory. Employers pull out of accommodation altogether which leaves employees exposed to risk of exploitation by landlords. Equally employers subsidize accommodation to a responsibly good level above the value that £33.74 could deliver. This is unsustainable in the long run.

In the worst case scenario, employers could deliver the bare minimum that £33.74 could cover and this is, in all likelihood, not at all humane and considerate of staff welfare.

Our suggestion is that the weekly benefit in kind offset cap be raised to £45.00/week at least. This would provide good quality accommodation and the true benefit that befits a valued and hard working group of employees.

We would be happy to discuss this further with you and your colleagues, and we look forward to hearing from you.

Yours sincerely



JAMES HALLETT
Chief Executive