

## Annex B: International Comparison of Seasonal Worker Schemes

	<b>UK</b>	<b>USA</b>	<b>Germany</b>	<b>New Zealand</b>	<b>Australia</b>
<b>Wages</b>	£10.42 per hour. Seasonal Worker Scheme (SWS) condition of employment - Guaranteed 32 hours pay, zero hours contracts are not allowed. ETI condition – Overtime, 1.25% paid after 48hours work (this is not a legal requirement but a customer expectation)	At least the highest of the adverse effect wage rate (AEWR), the applicable prevailing wage, the agreed-upon collective bargaining rate, or the Federal or State statutory minimum wage. <sup>1</sup>	€12.00 per hour. <sup>2</sup>	Employers must pay no less for doing the same job than they would pay a New Zealand citizen or resident with the same level of experience	Minimum hourly wage guarantee <sup>3</sup>

<sup>1</sup> [Fact Sheet #26: Section H-2A of the Immigration and Nationality Act \(INA\) | U.S. Department of Labor \(dol.gov\)](#)

<sup>2</sup> [Minimum wages - German Federal Statistical Office \(destatis.de\)](#)

<sup>3</sup> [Frequently asked questions | PALM scheme](#)

	<b>UK</b>	<b>USA</b>	<b>Germany</b>	<b>New Zealand</b>	<b>Australia</b>
<b>Employee costs</b>	<p>No requirement to supply accommodation although it is custom and practice. It is usual for the worker to be charged for the use. Accommodation offset is included in NMW legislation<sup>4</sup>. Travel from and to origin country paid by employee. SWS workers dependents cannot join their family in the UK.</p>	<p>Employers pay for transport to and from the worksite, food, housing, and travel reimbursements to and from the country of origin. Dependents may join on an H-4 visa.<sup>5</sup> If not previously advanced or otherwise provided, the employer must reimburse workers for reasonable costs incurred for inbound transportation and subsistence costs once the worker completes 50% of the work contract period. Once the worker completes the contract, the employer must provide or pay for return transportation and daily meals to point of origin. Employers must provide housing at no cost to workers.</p>	<p>No requirement to supply accommodation, although it is custom and practice. If the employer wants to deduct the costs for rent and meals from wages, this must be in the contract</p>	<p>Employers pay for half of the airfare from the country of origin. The employer arranges accommodation, but the cost falls on the workers.<sup>6</sup></p>	<p>Employers organise transport and accommodation and must pay the cost of travel to and from Australia.<sup>7</sup></p>

<sup>4</sup> [National Minimum Wage and Living Wage: accommodation: Accommodation rates - GOV.UK \(www.gov.uk\)](https://www.gov.uk/government/news/national-minimum-wage-and-living-wage-accommodation)

<sup>5</sup> [Fact Sheet #26: Section H-2A of the Immigration and Nationality Act \(INA\) | U.S. Department of Labor \(dol.gov\)](https://www.dhs.gov/immigration-fact-sheets/section-h-2a-immigration-and-nationality-act)

<sup>6</sup> [Factsheet.pdf \(ilo.org\)](https://www.ilo.org/public/libdoc/iloorg/1999/0/1999001.pdf)

<sup>7</sup> [What contribution do approved employers make to flights and transfers? | PALM scheme](https://www.palm.gov.au/what-contribution-do-approved-employers-make-to-flights-and-transfers/)

	<b>UK</b>	<b>USA</b>	<b>Germany</b>	<b>New Zealand</b>	<b>Australia</b>
<b>Social security</b>	<p><b>Employee</b> Weekly earnings above £242 taxed at 12%, and earnings above £967 are taxed at 2%</p> <p><b>Employer</b> Weekly earning above £175 taxed at 13.8%</p>	No requirement for workers to pay <sup>8</sup>	For short-term contracts (3 months or 70 working days), there is no requirement to pay Social Security <sup>9</sup>	This information could not be located.	This information could not be located.
<b>Tax</b>	Standard employee personal allowance (tax free amount) £12,570 per year or £242 per week. Basic rate at 20% for earnings up to £37,700 per year.	Wages are subject to U.S. federal income tax. <sup>10</sup>	Flat rate of 5% <sup>11</sup>	Flat rate of 15% <sup>12</sup>	Flat rate of 15% <sup>13</sup>
<b>Visa length</b>	For up to 6 months <sup>14</sup> in any 12-month period for horticulture work From 3 <sup>rd</sup> October to 31 <sup>st</sup> December for poultry working. This scheme is due to end in 2024.	3 years <sup>15</sup>	90 days within a 180-day period <sup>16</sup>	7 months within an 11-month period <sup>17</sup>	9 months <sup>18</sup>

<sup>8</sup> [H-2A Visa Program For Temporary Workers | Farmers.gov](https://farmers.gov.uk/h-2a-visa-program-for-temporary-workers/)

<sup>9</sup> [Seasonal work in Germany | Bundesagentur für Arbeit \(arbeitsagentur.de\)](https://www.arbeitsagentur.de/seasonal-work-in-germany)

<sup>10</sup> [H-2A Visa Program For Temporary Workers | Farmers.gov](https://farmers.gov.uk/h-2a-visa-program-for-temporary-workers/)

<sup>11</sup> [At a glance-Seasonal employment in Germany.pdf](#)

<sup>12</sup> [Non-resident seasonal workers' tax rate \(ird.govt.nz\)](#)

<sup>13</sup> [Seasonal Worker Programme and Pacific Labour Scheme | Australian Taxation Office \(ato.gov.au\)](#)

<sup>14</sup> [Seasonal Worker visa \(Temporary Work\): Overview - GOV.UK \(www.gov.uk\)](#)

<sup>15</sup> [H-2A Temporary Agricultural Workers | USCIS](#)

<sup>16</sup> [Work-related visas in Germany | Expatica](#)

<sup>17</sup> [Recognised Seasonal Employer Limited Visa: Visa details | Immigration New Zealand](#)

<sup>18</sup> [Frequently asked questions | PALM scheme](#)

	<b>UK</b>	<b>USA</b>	<b>Germany</b>	<b>New Zealand</b>	<b>Australia</b>
<b>Cap</b>	Total quota currently 47,000 <sup>19</sup> 45,000 Horticulture sector 2,000 poultry production section. (additional 10,000 visa's available if certain conditions are met)	No cap	This information could not be located.	Currently 19,000 <sup>20</sup>	This information could not be located.
<b>Source Countries</b>	No specific source countries for this scheme.	80 eligible countries	This information could not be located.	Eligible Pacific countries <sup>21</sup>	Pacific island countries and Timor-Leste <sup>22</sup>
<b>Health insurance</b>	SWS employees can access NHS treatment. It is recommended to employees to take out enhanced Health insurance.	Eligible for Medicare <sup>23</sup>	Employer pays <sup>24</sup>	This information could not be located.	This information could not be located.
<b>Visa processing times</b>	3 weeks <sup>25</sup>	75 days <sup>26</sup>	This information could not be located.	9 days <sup>27</sup>	Up to 43 days <sup>28</sup>

<sup>19</sup> [Workers and Temporary Workers: guidance for sponsors: sponsor a seasonal worker \(accessible version\) - GOV.UK \(www.gov.uk\)](#)

<sup>20</sup> [Recognised Seasonal Employer Limited Visa: Visa details | Immigration New Zealand](#)

<sup>21</sup> [Recognised Seasonal Employer \(RSE\) scheme research | Immigration New Zealand](#)

<sup>22</sup> [Home | PALM scheme](#)

<sup>23</sup> [H-2A Visa Agricultural Workers Medical Insurance \(insubuy.com\)](#)

<sup>24</sup> [Important information for seasonal workers \(arbeitsagentur.de\)](#)

<sup>25</sup> [Seasonal Worker visa \(Temporary Work\): Overview - GOV.UK \(www.gov.uk\)](#)

<sup>26</sup> [H-2A Visa Program For Temporary Workers | Farmers.gov](#)

<sup>27</sup> [Recognised Seasonal Employer Limited Visa: Visa details | Immigration New Zealand](#)

<sup>28</sup> [Temporary Work \(International Relations\) visa \(subclass 403\) Pacific Australia Labour Mobility stream \(homeaffairs.gov.au\)](#)

	<b>UK</b>	<b>USA</b>	<b>Germany</b>	<b>New Zealand</b>	<b>Australia</b>
<b>Application fee</b>	GBP £259 <sup>29</sup> (basic service provision)	USD \$460 <sup>30</sup>	EUR \$75 <sup>31</sup>	From \$325 NZD <sup>32</sup>	AUD \$325 <sup>33</sup>

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<sup>29</sup> [Seasonal Worker visa \(Temporary Work\): Overview - GOV.UK \(www.gov.uk\)](https://www.gov.uk)

<sup>30</sup> [H-2A Visa Program For Temporary Workers | Farmers.gov](https://farmers.gov)

<sup>31</sup> [Germany Employment Visa Requirements and Application Process - Germany Visa \(schengenvisa.info\)](https://schengenvisa.info)

<sup>32</sup> [Recognised Seasonal Employer Limited Visa: Visa details | Immigration New Zealand](https://immigration.govt.nz)

<sup>33</sup> [Temporary Work \(International Relations\) visa \(subclass 403\) Pacific Australia Labour Mobility stream \(homeaffairs.gov.au\)](https://homeaffairs.gov.au)