MAC Call for Evidence – Representative bodies

This strand of the Call for Evidence is for representative bodies and will remain open until Monday 2nd February 2026.

A1. What is the name of your organisation?
Fuels Industry UK

A2. What is your email address?
Jamie.baker@fuelsindustryuk.org

A3. What is your role within the organisation?
Director of External Relations

A4. Thinking of the organisations or members you represent, in general are staff
concentrated in specific UK countries/regions or are they UK-wide?
UK-wide

A5. And which region(s) or country(ies) are these organisations or staff concentrated?
All regions/countries

A6. What is your coverage of the sector you represent? For example, the number and proportion of employers and employees you represent (or employ, for employers) and your sub-sector coverage
Fuels Industry UK represents companies which are involved in the supply of 85% of the UK's fuel demand. We represent all 4 remaining major refineries and a significant proportion of terminal and pipeline operators, as well as companies owning or operating around 1/8 of the UK's forecourts.

Jobs Plans

A7. Does your organisation represent one of the Industrial Strategy sectors or Critical Infrastructure?

No – The organisations we represent are outside of this, but employ occupations
that are under consideration for the TSL

Please note we are not able to accept evidence for occupations other than the ones listed in our Stage 1 report here.

A8. <If 'Yes' for A7> Have you been participating in the process for developing a Jobs Plan
with government?
Yes
No

A9. <If 'Yes' for A7> Which one of the Industrial Strategy sectors or Critical Infrastructure
does your organisation represent?
Advanced Manufacturing
Clean Energy Industries
Creative Industries
Defence
Digital and Technologies
Financial Services
Life Sciences
Professional and Business Services
Critical infrastructure

A10. <If 'No' for A7> What sector does your organisation represent?
Please select all that apply
Agriculture, forestry and fishing
Mining and quarrying
Manufacturing
Electricity, gas, steam and air conditioning supply
Water supply; sewerage, waste management and remediation activities
Construction
Wholesale and retail trade; repair of motor vehicles and motorcycles
Transportation and storage
Accommodation and food service activities
Information and communication

Financial and insurance activities
Real estate activities
Professional, scientific and technical activities
Administrative and support service activities
Public administration and defence; compulsory social security
Education
Human health and social work activities
Arts, entertainment and recreation
Other service activities
Activities of households as employers; undifferentiated goods- and services-
producing activities of households for own use
Activities of extraterritorial organisations and bodies
We operate across all sectors
Don't know

Section A – Occupation summary

SOC code: Select SOC code here (For "not elsewhere classified"1 occupations only) What are the relevant job title(s) for this occupation?: <free text>

Roles	MAC Shortlisted?	Notes
Welders (SOC 5213), Pipe fitters (5214), Electricians (5241), Steel erectors/riggers (5311)	Yes	These are essential for maintenance of major plant including in the fuels sector in particular during major maintenance or upgrade projects. NB Industrial Electricians working in hazardous (ATEX) environments, (not domestic or commercial electricians)

Mechanical Fitters (SOC 5223)	Yes	Needed to keep things moving on sites, and often employed on long term contractor basis (not FTE)
Scaffolders (SOC 5319)	Yes	An enabling trade which is vital to allowing other key roles to work
Industrial Insulators	Potentially Shortlisted (SOC 5319)	Important in energy efficiencies in the sector which uses high and low grade heat
Catalyst Workers	Not explicitly listed (SOC 8113?)	Vital in refinery operations, may also be important in Industrial Strategy sectors e.g. chemicals
Dredging Workers	Not explicitly (SOC 8232?)	Will be key to many coastally located industrial sites of many sectors but unclear if on TSL

Section B - Shortage and drivers

Please provide an overview of the occupation, current and recent shortage, and the drivers of any shortage. This could include what role this occupation plays within the sector, the barriers to training, recruitment and retention.

For the purpose of this response, the roles we have identified in Section A are grouped by their common industrial application in our sector's (often Critical National Infrastructure) maintenance and transformation projects.

What is the current scale of shortage for these occupations?

For the purpose of this response, these 11 roles are grouped by their common industrial application in Critical National Infrastructure (CNI) maintenance and transition projects.

B1: What is the current scale of shortage for these occupations?

Input: Shortages across these 11 roles are **severe and persistent**, particularly during "Turnaround and Inspection" (T&I) periods.

- **Mechanical & Piping:** (Welders, Pipe fitters, Mechanical Fitters, Boilermakers) – Shortages often exceed 20-30% of required headcount for peak maintenance windows.
- **Access & Structural:** (Riggers, Steel erectors, Scaffolders, Insulators) – Critical path delays are common due to a lack of "Ticketed" (RQF 3) specialists.
- **Process Specialist:** (Catalyst workers, Dredging workers, Electricians) – These roles are highly niche; for example, dredging is critical for jetty access at coastal refineries (Fawley, Pembroke, Stanlow, Humber), and shortages here can physically bottleneck fuel imports.

How long has the shortage for these occupations lasted?

The shortage has been **sustained for over 5 years**, and it is unclear if the closures of two refineries in 2025 (Grangemouth an Lindsey) will have a positive – by reducing competition - or negative impact – if overall demand means that long-term role shortages continue not to be filled by the contractor]/ trades community - on the availability of these workers for the remaining sector.

What are the main drivers of the shortage?

1. **Critical National Infrastructure (CNI) Demands:** Even while the critical infrastructure definitions in Stage 1 of the MAC report is not the same as CNI sites, it is important to consider that CNI sites have specific needs due to their safety profile: high-hazard environments requires specific site-safety qualifications (e.g., CCNSG Lead Safety Passport) which limits the pool of available labour

2. **The "Ownership/Responsibility Gap":** A critical driver in this sector is the Indirect Employment Model whereby refineries (asset owners) rely on 3rd-party contractors for these roles – this is due to trades roles often seeing a spike in demand for major projects which might only be delivered for 3 months in a 4+ year cycle – meaning we cannot support full time employment. Consequently:
    - **Asset owners** do not directly employ or train these trades.
    - **Contractors** operate on short-term contracts, making long-term apprenticeship investment less likely
    - **Jobs Plans** - a centralised "Jobs Plan" has no single entity which "owns" the workforce development for these cross-sector contractors.

What educational, training, or other barriers exist to domestic recruitment?

- **Lack of a Sector Skills Plan:** As noted, the fragmented nature of the contractor-client relationship means there is no unified vocational roadmap for these roles within the fuels sector as we are only temporary employers of them.
- **Aging Workforce:** A significant proportion of scaffolders and insulators are reaching retirement age, with insufficient "new blood" to meet the physical demands of high-elevation refinery work.

Section C – The future

Please provide an overview of recent employment trends and what future employment might look like for this occupation over the next 5-10 years. Your response could include demand, supply and shortage estimates, the drivers of these changes, regional or Devolved Nation impacts, and any additional data considerations.
See Section C of the guidance for more information.
Please note that this response field has a limit of approximately 750 words, based on a character count.

- **Projected Demand:** Given the closures of two refineries in 2025, it is likely that demand for the roles identified in earlier questions (Welders, Pipe fitters, etc.) will fall over the next decade, however, will

still be needed to a significant degree in the sector. This is driven by the simultaneous need to maintain the UK's existing refining and fuel distribution network while constructing the infrastructure for the energy transition (e.g., Carbon Capture and Storage (CCS), Hydrogen production, and Sustainable Aviation Fuel (SAF) plants).

- **Aging Workforce:** According to ECITB (Engineering Construction Industry Training Board) data, roughly 15% of the engineering construction workforce is aged 60 or over, and in certain trades like welding and pipe fitting, this demographic skew is even more pronounced. Over the next 5–10 years, the industry faces a "supply cliff" where the rate of retirement far outstrips the volume of new domestic entrants.
- **Jobs Plans Unclear Ownership:** A primary concern for the future is the "Ownership Gap" regarding skills development. Because the vast majority of these roles are delivered via third-party contractors rather than direct refinery employees, there is no single entity currently "owning" the long-term workforce pipeline.
    - **The Asset Owners (Refineries, terminals and pipelines):** Do not directly employ these trades and therefore have limited ability (or incentive) to invest in a multi-year national apprenticeship/workforce pipeline for a workforce they do not control.
    - **The Contractors:** Operate on project-based contracts, making it difficult to sustain high-cost training programs without long-term guarantees. We have engaged with the relevant trade associations which represent those companies and do not believe they are developing a Jobs Plan.

Section D – Actions

Please provide an overview of the actions that have been, or are being taken, by industry and the government to address any shortfall.
For new actions that can be linked to the specific SOC code, we would suggest separating these out into a bullet point list, highlighting what the action is, what the anticipated will be and the relevant timeframe.
This response should also include the impact of not being on the Temporary Shortage List, why migration should be the response to any

shortage, and any explanation of how the risk of exploitation of both domestic and migrant workers in the sector will be managed.
Evidence provided should be supplementary to actions outlined in the Jobs Plans.
See Section D of the guidance for further prompts.
Please note that this response field has a limit of approximately 1,000 words, based on a character count.

Actions taken by the sector:
Trying to retain workers from closed sites: Following recent refinery closures (e.g., Grangemouth, Lindsey), Fuels Industry UK has worked with the closing sites and our other members to try and find within-sector roles for those jobs lost at those sites. Individual sites have worked with the relevant government (Scottish and Westminster) departments to reskill, retrain and where possible retain workers.
Apprenticeship Relevance Review: Following the 2022 *"Future Skills for the Downstream Sector"* report, we have audited existing apprenticeship frameworks to ensure the relevance of roles now and in future.
Working with other sectors: We engage with the **ECIA** and **ECITB** given their relevance to the contractor workforce.

Impact of Not Being on the Temporary Shortage List (TSL)
If key roles are not included on the TSL, the UK fuels industry faces three critical risks:

1. **More downtime for manufacturers:** Delays to regulatory maintenance and margin improvement works due to labour shortages at worst increase the risk of unplanned outages at refineries. This also affects our own competitiveness over time – some refineries have had to increase the number of shutdowns for maintenance as the workforce available has meant projects must be smaller in scope which is a less efficient delivery of those projects.
2. **Energy Security and Resilience:** The long term impact of such skills shortages is in reduced energy security from increased maintenance and project outages (or if the remaining 4 UK refineries were to shut down). Potentially reducing domestic refinery output – even temporarily - by having to wait for UK skills to develop increases reliance on imports in an uncertain geopolitical environment. While relying on overseas workers is also problematic and introduces

similar reliance on imported labour, in the short term, the skills shortages should not be made worse by reducing the scope of the skilled worker route at the cost of increasing energy security risks.

3. **Net Zero delivery** The same skilled trades (Welders, Pipe fitters, Electricians) required for refinery maintenance are essential for building the UK's Hydrogen and CCUS infrastructure, with refineries like Stanlow in the Track 1 CCS process for DESNZ and the Humber refinery working closely with Viking CCS project in Track 2. Excluding them from the TSL risks further delay to the UK's decarbonisation targets.

Why Migration is the Necessary Response

Migration is not a substitute for domestic workforce and training. The ownership gap for a Jobs Plan identified earlier in our response between our sector and 3rd-party contractors means that a domestic training pipeline cannot be "fixed" overnight, yet the migration announcements made midway through 2025 are expecting to see Jobs Plans now and limit necessary visa routes for sectors like our own.

- **The Lead-In Time:** It takes 3–4 years to train a high-integrity Welder or Industrial Electrician to the required safety standard for a refinery environment.
- **The Transition Period:** As we move toward a Net Zero downstream sector, we require a mobile, international workforce to maintain critical national infrastructure assets while the domestic workforce is upskilled for new technologies (on our own, upgraded sites, and in emerging sectors).

Managing the Risk of Exploitation

The fuels industry is a highly regulated sector in the UK, which inherently mitigates the risk of exploitation:

- **Safety-Critical Governance:** Every worker on a refinery site, regardless of nationality, must undergo rigorous site-specific safety inductions and hold recognized certifications (e.g., CCNSG Lead Safety Passport). The high-hazard nature of our sites requires a culture of "Speak Up" and safety oversight that is incompatible with exploitative labour practices.
- **Sponsorship Compliance:** Our member companies and their Tier 1 contractors are well established sponsors with established HR

compliance frameworks to ensure all migrant workers are treated in accordance with UK law and Home Office regulations.

- **Collective Bargaining (NAECI):** Most of the roles identified are covered by the **National Agreement for the Engineering Construction Industry (Blue Book)** which is used by many of our sites. This helps ensure that both domestic and migrant workers are paid standardised, transparent rates with robust terms and conditions, preventing any "race to the bottom" on wages.

Closing questions

E1. Would you be happy for us to quote from your responses to this CfE?
Yes

E2. Would you be happy for us to name your organisation in the published report?
Yes

E3. Would you be willing for us to contact you if we needed to clarify or supplement
responses you have given in this questionnaire?
Yes

E4. If yes, who is the best contact? Please provide their name and email address.
Jamie Baker, Jamie.baker@fuelsindustryuk.org

E5. Would you like to be considered for a future stakeholder event, if/when they are
scheduled?
Yes