

Industry Training Board Reform Government consultation

Approach to ITB reform

1. Do you agree with the proposal to create a single, unified ITB by bringing together the CITB and ECITB?

Yes

No

Don't know

2. Please explain the key reasons for your answer to question 1. (Please answer in up to 500 words.)

The downstream fuels sector is a safety-critical, high-hazard industry that relies on a blend of construction and engineering construction skills. Our workforce model is potentially unique: refineries and terminals depend on a small core workforce and a large, highly skilled contractor base, particularly during turnarounds, major maintenance and decarbonisation projects. As such while our principal engagement is with engineering construction, work straddles across both CITB and ECITB scopes. Evidence we have previously submitted to the [Migration Advisory Committee](#) and [ESNZ Committee](#) shows that the sector faces:

- *Shortages in mechanical, electrical, instrumentation and welding trades*
- *An ageing workforce, with over 40% of skilled technicians expected to retire within 10 years*
- *Pressure for UK workforce for safety-critical roles*
- *Reliance on a mobile temporary contractor workforce, often drawn from ECITB-regulated disciplines where the sector is not large enough to offer full time roles.*
- *Visa and migration constraints that limit access to essential skills during peak demand*

These challenges require a specialist engineering construction skills system, and we are concerned that these proposals risk dilution of existing arrangements or a construction majority model and exacerbating the issues we are already seeing. We acknowledge the potential that a unified ITB could reduce duplication, but we need greater reassurance as the proposal lacks clarity on how ECITB's high-hazard competence frameworks, contractor assurance models and safety-critical standards will be protected. These frameworks are essential for COMAH-regulated sites and underpin safe delivery of turnarounds, tank builds, pipeline works and decarbonisation projects.

Given the strategic importance of refining and terminals to UK fuel resilience and energy security, we cannot support a merger unless there is explicit protection for engineering construction specialism, governance and funding.

3. What do you see as the most significant potential benefits of a single, unified ITB and how might these be maximised? (Please answer in up to 500 words.)

A unified ITB could deliver benefits if designed correctly, including:

1) Integrated skills planning for major industrial projects:

Refineries and terminals are entering a decade of simultaneous decarbonisation and asset-life extension. A single ITB could support long-term workforce planning aligned to: Major turnaround cycles; Tank and pipeline upgrades; Discretionary margin-improvement upgrades ; SAF and biofuel production; Hydrogen blending and infrastructure; CCUS integration.

2) Reduced duplication and clearer employer interface:

Employers currently navigate two levy systems, two grant schemes and two sets of standards. A unified ITB could streamline this but only if the levy(ies) remains neutral and sector ring-fencing to the extent it exists now is guaranteed.

As noted in our response to Q2, it is however essential that any combination of schemes will i) Protect ECITB's engineering construction specialism as a distinct pillar ii) Ring-fence levy income for specialist sectors iii) Maintain contractor assurance frameworks essential for COMAH sites.

4. What do you see as the most significant potential costs and risks of a single, unified ITB and how might these be mitigated? (Please answer in up to 500 words.)

Dilution of high-hazard competence standards. ECITB frameworks are essential for safe operation of refineries and terminals. Mitigation: Statutory protection for engineering construction standards and grant structures.

Loss of specialist focus. Engineering construction is small in number but critical in national importance. Mitigation: Equal governance representation for engineering construction.

Disruption to contractor workforce pipelines. The fuels sector relies on a mobile, highly skilled contractor base; any disruption would affect turnarounds and resilience. Mitigation: A phased transition aligned to turnaround cycles.

Levy redistribution. Funds raised from high-hazard industries could be diverted to general construction. Mitigation: - Transparent levy accounting with sector-based

allocation as well as Explicit recognition of high-hazard industries in the new ITB's remit.

5. If you answered 'No' or 'Don't know' to question 1, please identify any other approaches to ITB reform that should be considered and the reasons why they would be more effective in meeting the employers' construction and engineering construction skills needs. *(Please answer in up to 500 words.)*

As noted above, our principal concern is that we risk losing the existing arrangements for engineering construction by being blended with the wider construction sectors. As such, changes that are able to clearly retain that essential focus would be welcomed – indeed they may already be in the existing proposals, but are not yet clear as there is insufficient detail.

We would also note that the recent MAC consultation is and government's own work is moving to a more sector-specific workforce planning expectation with regards to the shortage occupation list. For sectors like our own which do not directly employ our (contractor) workforce, this is a large risk and risks moving away from the beneficial system we have with the levies to encourage the UK skills pipeline.

Options could include:

- Keep two Boards but move to a shared services model for levy collection, grants and digital systems.*
- Joint skills consideration for cross-sector skills but to avoid duplication (welding, scaffolding, project controls, digital engineering).*
- Mutual recognition of standards to reduce duplication for contractors – there are many schemes already trying to help with this regards 'skills passports' but they remain disparate.*

6. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative impacts on individuals with protected characteristics. *(Please answer in up to 500 words.)*

We do not have a view on this question.

7. Please provide any evidence you believe is relevant to the assessment of whether the proposal for a single ITB would have positive or negative environmental impacts. *(Please answer in up to 500 words.)*

We understand this question refers to environmental impacts directly of the proposal rather than its wider ability to enable investments and infrastructure build of projects that have environmental benefits, in which case we do not see any environmental impacts.

Options for further ITB reform

8. Please provide any views on changes that should be made to the employer activities currently in scope of the CITB and ECITB to better reflect the needs of the construction and engineering construction sectors. *(Please answer in up to 500 words.)*

We do not have a view on this question. Existing Levy payers appear representative of the sectors necessary to cover.

9. Please provide any views on whether the maximum levy period for an ITB should be extended beyond 3 years and, if so, what the new maximum should be. *(Please answer in up to 250 words.)*

A longer levy period (e.g., 5 years) could support long-term planning for decarbonisation and turnaround cycles. However, this should only be adopted if Levy neutrality is guaranteed, sector-specific ring-fencing is maintained, and employers retain influence over annual priorities.