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Non-EEA migration to Ireland in times of labour and skills shortages

ADA SOPHIA HAHN AND DERVLA POTTER

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Ada Sophia Hahn

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Abbreviations

AWS	Atypical Working Scheme
CSOL	Critical Skills Occupations List
DETE	Department of Enterprise, Tourism and Employment
DFHERIS	Department of Further and Higher Education, Research, Innovation and Science
DJHAM	Department of Justice, Home Affairs and Migration
EEA	European Economic Area
EGFSN	Expert Group on Future Skills Needs
EMN	European Migration Network
EP	Employment permit
EPO	Employment Permits Online
EU	European Union
HEA	Higher Education Authority
ICI	Immigrant Council of Ireland
ICT	Information and communications technology
IDG	Interdepartmental group
IOL	Ineligible Occupations List
ISD	Immigration and Service Delivery
LMNT	Labour market needs test
MAR	Minimum Annual Remuneration
MPF	Migration Partnership Facility
MRCI	Migrant Rights Centre Ireland
NGO	Non-governmental organisation
OECD	Organisation for Economic Co-operation and Development
SLMRU	Skills and Labour Market Research Unit
UK	United Kingdom
WRC	Workplace Relations Commission

Executive summary

Across the EU, labour and skills shortages have become a critical challenge, driven by demographic ageing and a shrinking supply of workers. Ireland faces similar pressures. With employment and labour force participation at a high and unemployment at a low, employers in a growing number of sectors report difficulties in recruiting and retaining workers. Shortages persist across both high skilled and low skilled occupations in fields such as health and social care, construction, ICT and transport.

Persistent labour and skill shortages have significant implications for economic growth, competitiveness, and for the availability of public services. While the Irish Government's primary objective is to meet labour needs from within the Irish and EEA workforce, labour immigration has become an increasingly important tool where shortages cannot be addressed domestically.

With a focus on the employment permit system, this report analyses the immigration of non-EEA workers as a response to Ireland's labour and skills shortages. The research asks how Ireland's legislative and policy framework for managing labour immigration has developed over the years and identifies challenges and good practices therein. The report's findings are based on desk research, interviews, and stakeholder consultation considering the period 2021-2025 inclusive.

Labour and skills shortages in Ireland

The Irish government defines labour shortages as situations in which there is an insufficient number of individuals willing or available to take up employment opportunities. Labour shortages are measured via the vacancy rate which indicates the share of unfilled jobs relative to all jobs in a given labour market. Ireland's vacancy rate amounted to 1.3 per cent in 2025, which is higher than the 1.1 per cent recorded in 2019, yet well below the EU average of 2.3 per cent.

A range of qualitative indicators is additionally used to identify and measure labour and skills shortages at an occupational level. In Ireland, these are primarily associated with the work of the Skills and Labour Market Research Unit within SOLAS as well as with the Expert Group on Future Skills Needs. A particularly important source in this

context is the National Skills Bulletin, an annual publication which is used, among other evidence, to determine which occupations should be made eligible for an employment permit. As of 2025, the Skills and Labour Market Research Unit identified a labour or skills shortage for 19 occupations. Shortages were attributed to roles across the ICT, engineering, health and social care, construction, transport, and education fields. In these cases, insufficient supply of labour and skills requires policy intervention, such as by facilitating the immigration of foreign workers.

Ireland's economic migration policy framework

In managing the immigration of non-EEA workers, Irish economic migration policy follows two key principles: maintaining priority access to job opportunities for Irish and EEA workers (community preference) and facilitating non-EEA recruitment only where labour shortages cannot be addressed domestically (labour market need). Primary responsibility for Ireland's economic migration policy lies with the Department of Enterprise, Tourism and Employment (DETE) that manages the employment permit (EP) system. DETE frequently coordinates with other departments and agencies for that purpose; most importantly, with the Department of Justice, Home Affairs and Migration (DJHAM) responsible for policy on all remaining aspects of migration, integration and asylum.

In 2024, Ireland passed a new Employment Permits Act in the largest reform of the national labour immigration system since 2006. These reforms aimed to increase the attractiveness of Ireland as a destination for foreign talent and create a more agile system capable of responding flexibly and effectively to changing labour market demands, according to DETE. Among the most significant changes under the Act is a new change of employer provision which allows employment permit holders to change their employer after nine months, without the need to apply for a new permit. The Act also removed the need to apply for a new permit in certain other instances, such as internal transfer or promotion. Safeguards were similarly strengthened, as the Minister now may refuse application where employers fail to meet certain conditions, such as providing adequate health insurance, accommodation, or training to the migrant worker. Crucially, the Act also introduced a new permit type, the Seasonal EP, aligning Ireland more closely with other EU countries. It offers

employers a recruitment option tailored to seasonally occurring labour needs. A first pilot of this scheme ran in 2025.

Criteria for granting an employment permit

In line with EU norms, the Irish employment permit system is demand-led and vacancy-based. This means that a non-EEA migrant may only move to Ireland for work where a job offer already exists. A range of additional conditions must be met by both employer and employee before DETE may issue an employment permit. One such condition is the labour market needs test. It requires employers to test the labour market prior to sponsoring a foreign worker, to ensure there are no workers available domestically to meet demand. In practice, Irish employers must place their vacancy advert on a minimum of two online platforms for 28 consecutive days. The *Employment Permits Act 2024* fully digitalised this process, as the test, prior to 2024, still required companies to advertise in print media.

Like several other EU countries, Ireland operates two shortage occupations lists which determine the overall eligibility of a given vacancy for foreign recruitment. A first Critical Skills Occupations List (CSOL) identifies roles which are highly skilled, highly demanded, and in significant shortage of supply in both the Irish and EEA labour market. Filling these skills needs is, according to DETE, critical for maintaining Ireland's economic growth. Its counterpart, the Ineligible Occupations List (IOL) identifies those roles for which no EP may be issued due to sufficient supply of workers EEA-wide. In 2021 and in 2023, DETE significantly expanded the range of eligible occupations by expanding the critical skills list and narrowing the ineligible list.

Employers must also comply with the 50:50 rule which requires companies to demonstrate that at least 50 per cent of their employees are Irish or EEA workers before they may recruit from abroad. This 50:50 rule for companies is unique among EU countries.

Quota restrictions apply to certain low- or medium-skilled roles. In these cases, no additional employment permits may be issued where the maximum number set for that role has already been exhausted.

Lastly, the government requires that Minimum Annual Remuneration (MAR) thresholds are met. The MAR thresholds differ across permit types and require employers to pay a minimum salary to sponsor a non-EEA national. The MAR thresholds underwent several reviews and

increases in recent years as the *Employment Permits Act 2024* provided for an annual indexing of the thresholds. The most recent 2025 MAR Roadmap introduced gradual increases across all permit types, the first of which took effect in March 2026. Salaries were increased for the General EP from €34,000 to €36,605 and for the Critical Skills EP from €38,000 to €40,904.

Employment permit (EP) types

Ireland offers ten EP types, the two most common of which are the Critical Skills EP, and the General EP. Eligibility for the Critical Skills EP is largely determined by the Critical Skills Occupations List as well as meeting the applicable MAR thresholds, which are higher than for other permits. According to DETE, the Critical Skills EP aims to attract highly skilled migrants and encourage their permanent residence in the State. Its residency and employment conditions are more attractive and offer, for instance, immediate access to family reunification and eligibility to apply for a Stamp 4 permission after two years on the initial permit.

DETE classifies the General EP as the primary vehicle to attract third country nationals into Irish shortage occupations. In contrast to its Critical Skills counterpart, most occupations and skill levels are eligible unless excluded by the Ineligible Occupations List. Employers hiring foreign workers on the General EP must additionally conduct a labour market needs test before applying. Lower MAR thresholds apply to the General EP than to the Critical Skills EP. General EP holders have access to family reunification after an initial 12-month waiting period and may apply for a Stamp 4 after five years.

While the Critical Skills EP and General EP collectively account for over 90 per cent of all permit issuances each year, several other categories exist to cover specific instances of non-EEA recruitment. One such is the new Seasonal EP currently in its pilot phase in the horticulture sector. A Reactivation EP protects migrant workers who lost their job through no fault of their own, for instance, in cases of redundancy or workplace exploitation. It thus regularises existing employment permit holders who fell out of employment and no longer hold valid residency. Special employment and residency conditions also apply to foreign graduates of Irish universities, whose talent retention is encouraged through the third-level graduate programme. Students may request a job search permission (on the Stamp 1G) for 12 or 24 months upon graduation to facilitate their transition into the employment permit

system. As of 2025, a lowered MAR threshold for foreign graduates (applicable to both the General and Critical Skills EP) is intended to ease the transition from student to employee.

Employment permit data

Overall use of the employment permit system has fluctuated greatly in the past two decades. Notably, in the time period considered for this research (2021-2025 inclusive), the total number of EPs more than doubled within the span of a single year: from just 16,275 in 2021 to 39,955 in 2022. Numbers nonetheless remain below the record of 47,551 permits issued in 2003, a time of exceptionally high economic growth in Ireland when relatively few restrictions on non-EEA recruitment were in place. This recent surge can be attributed to a combination of factors. Most importantly, DETE opted to broaden the range of occupations that are eligible for recruitment through the employment permit system. The largest expansion to date occurred in 2023 when a total of 33 new roles were introduced to the employment permit system. Notably, it is particularly lower skilled occupations that were impacted by this, sponsorable under the General EP. Occupations such as care worker, healthcare assistant, electrician and mechanic were all made newly eligible during these most recent policy changes, benefitting in particular the Construction and Healthcare sectors.

Employers can now hire non-EEA workers across a broader range of occupations than was possible before 2021.This is reflected in the growing number of economic sectors relying on foreign recruitment today. Compared to previous years, a more diverse range of sectors is represented in the employment permit system. Next to Information and communication, historically smaller sectors in the employment permit system recently increased their recruitment of non-EEA workers, as was the case in Transport and storage, Accommodation and food services, and Construction. Health and social work continues to be the largest sector having sponsored a quarter of all employment permits issued or renewed in 2025.

Comparison with data from the National Skills Bulletin further confirms that, broadly speaking, employment permits are issued for occupations impacted by a labour or skills shortage. The exceptions are the business and financial occupations, which account for a relatively high share of employment permits despite not being

associated with any distinct skills shortages, as per the Skills and Labour Market Research Unit.

As in previous years, Indian nationals accounted for the largest share of employment permit holders in 2025 at 32 per cent. They are followed by the Philippines and Brazil at 11 per cent each.

A large number of companies today rely on recruitment through the employment permit system. On the one hand, we see that a few high-volume employers account for a considerable share of overall non-EEA recruitment. On the other hand, more than half of all companies in the system sponsored just a single employment permit. This seems to suggest that the administrative and financial barriers to employment permit sponsorship are low enough that recruiting just a single non-EEA worker is economically viable to Irish employers.

Challenges and good practices

The research further identified a range of good practices and opportunities regarding Ireland's approach to economic migration, many in reference to policy changes under the *Employment Permits Act 2024*. The new change of employer provision, for instance, functions as an important safeguard for migrant workers and may significantly reduce their risk of exploitation. Stakeholders consulted for this research also underlined the important safeguarding function inherent to the Reactivation EP as it protects migrant workers in cases of redundancy or exploitation. The newly adjusted MAR thresholds for international graduates are expected to ease the retention of international talent that underwent education and training in Ireland. Digitalisation efforts generally and the launch of the new Employment Permits Online portal specifically now make it easier and faster for employers and employees to navigate recruitment. DJHAM's decision to grant immediate labour market access to spouses/de facto partners and children aged 16-18 years was also welcomed as it makes Ireland a more attractive destination for foreign talent and eases integration of the family unit. It also grows the Irish labour force where family members are automatically granted the right to work. The new Seasonal EP piloted in 2025 adds flexibility to the employment permit system and may help employers in meeting seasonally occurring labour needs.

Challenges persist where employment permit holders are unable to fully exercise their rights or are subjected to mistreatment at the hands

of employers. Compliance breaches are particularly common in lower-skilled and lower-paid roles, and stakeholders flagged risks surrounding the new Seasonal EP in that context. Frequent information and awareness gaps perpetuate this issue as migrant workers may be unable to recognise situations of exploitation or are unaware of their options to recourse. Targeted information campaigns and improved communication between the Departments and migrant workers could help close this gap. Stakeholders also identified the recognition of foreign qualifications in regulated professions as an area for policy intervention. Navigating the process to achieve formal qualification recognition can be costly, lengthy and complex. Improving qualification recognition is particularly important as many shortage occupations are regulated professions. This is the case, for instance, for medical professionals, engineers, and teachers. Lastly, stakeholders highlighted differences in access to rights between employment permit holders as a challenge. General EP holders have limited access to certain benefits including to family reunification. NGOs argue that this creates a tiered rights regime and negatively impacts attraction and retention potential across this cohort. As the share of employment permits across lower and medium-skilled roles grows, ensuring adequate rights and safeguards are in place for migrant workers will continue to warrant close policy attention.

Chapter 1
Introduction

1.1 Background

Labour and skills shortages across the EU have intensified significantly in the years following the COVID-19 pandemic (Arpaia and Halasz, 2023; OECD, 2024a; EMN, 2025). Shortages persist for high-, medium- and low-skilled occupations across sectors such as Health and social work, Construction, Information and communication technology, Accommodation, and Agri-food (Causa et al., 2022; 2024; McNaboe et al., 2025a). In this context, labour shortages – and how to address them most effectively – increasingly appear on European policy agendas due to concerns for national productivity, availability of public services, and overall economic growth (OECD, 2024a; EMN, 2025). Where national labour supply is unable to fully meet those needs, countries frequently turn to immigration as a policy response (EMN, 2025).

This is also the case in Ireland, where a low unemployment rate makes it increasingly difficult to meet all demand for labour domestically (McNaboe et al., 2025a). While the Government's primary aim is to ensure labour market needs can be met from within the Irish and EEA workforce, labour immigration is used as a complementary policy tool where skills deficits cannot be fully addressed nationally and are likely to persist in the medium to long term (DETE, 2025c). In fact, migrant workers have been a main driver of Irish employment growth in recent years (OECD, 2024a; Department of Finance, 2025a) and non-Irish citizens now make up one-in-five people in employment (McNaboe et al., 2025a). This report examines these trends in greater detail by analysing the immigration of non-EEA workers as a policy response to Ireland's labour and skills shortages. The research builds upon the European Migration Network (EMN, 2025) Study *Labour Migration in Times of Labour and Skills Shortages* and extends its findings in the Irish context.

1.1.1 Labour market context

The Irish labour market has recovered strongly from the effects of the COVID-19 pandemic, recording robust employment growth since 2021 (Department of Finance, 2025a). Both the number of persons in the labour force (i.e. the share of people either in work or actively looking for work) and of those in employment grew by 2.8 per cent and by

2.7 per cent respectively in 2024 compared to the previous year (McNaboe et al., 2025a). Since 2019, 440,000 jobs have been created in Ireland, driven by an expansion in the overall labour force caused by inward migration and the increased participation from women and older persons (Department of Finance, 2025a).

A relatively stable unemployment rate of 4.3 per cent has remained amongst the lowest annual averages since pre-recession levels (McNaboe et al., 2025a). Ireland's labour market activity rate (i.e. the ratio of the labour force relative to the total working age population) of 83 per cent ranks above the EU average of 80 per cent (Eurostat, 2025). Considering this, the Irish labour market is in a condition typically associated with full employment (McNaboe et al., 2025a).

While full employment is a generally a sign of a well-functioning economy, it also implies that there are fewer working age persons available to fill vacant posts (McNaboe et al., 2025a). In times of employment growth, employers may thus struggle to find workers with the right skills to meet their needs (Department of Finance, 2025a). The job vacancy rate is generally used to give an indication of the share of unfilled jobs relative to all jobs (Arpaia and Halasz, 2023). Ireland's job vacancy rate amounted to 1.3 per cent in 2025, which is indicative of some unmet demand for labour; yet falls below the EU average of 2.1 per cent (CSO, 2026a; Eurostat, 2026a). Considered alongside Ireland's relatively low unemployment rate, however, we find that not all demand for labour is met with sufficient supply leading to shortages in certain sectors.

Importantly, certain roles, sectors and firms are disproportionally affected by unmet demand for labour, according to the Skills and Labour Market Research Unit (SLMRU) (McNaboe et al., 2025a; SLMRU, 2025a). The Information and communications technology, Health and social care, Construction, Science and engineering, Education, Transport, and Hospitality sectors were all identified as facing labour or skills shortages as of 2025 (McNaboe et al., 2025a). According to the SLMRU, the attractiveness of more manual or operative roles is particularly in decline, affecting occupations such as healthcare assistants, care workers, chefs, bus and coach drivers, as well as plumbers (McNaboe et al., 2025a). Shortages at the upper end of the skills spectrum also exist, for instance, for engineers, software developers, nurses and secondary school teachers (McNaboe et al., 2025a; SLMRU, 2025a). Shortages also tend to be unevenly distributed

across companies: younger and smaller firms tend to find it more difficult to meet their labour demand compared to more established and productive firms (OECD, 2024a; Kumar and Donoghue, 2024).

Various factors drive labour and skills shortages

One of the main driving forces behind labour shortages is the demographic pressure caused by population ageing (EMN, 2025). The European Commission estimates that the EU's working age population will decline by 57.4 million by 2100. An ageing population entails both a decrease in the size of the labour force as well as an increase in the demand for labour in health and care services (European Commission, 2023). The CSO estimates that the Irish old-age-dependency ratio (i.e. the ratio of residents aged 65 years and over as a percentage of the working age population) will increase from 25 per cent in 2027 to 49.8 per cent by 2057 (CSO, 2026c).

Demographic challenges are further exacerbated by the emigration of working age residents from Ireland. The number of Irish and non-Irish emigrants leaving the State increased by 37 per cent between 2020 and 2024, the majority of whom were aged between 15-44 years of age (Creaton et al., 2025). While some of this migration is cyclical (CSO, 2025a), the emigration of working age residents can decrease the size of the available labour force. As the Irish State does not operate a population register or airport exit checks, it remains difficult to accurately estimate emigration. Instead, Irish household surveys and visa data from common destination countries are typically used, making estimates unreliable. Some experimental administrative data analysis shows higher rates of emigration (CSO, 2025b).

Labour shortages are also driven by poor job quality. Irish sectors experiencing worker shortages are frequently associated with poorer health outcomes, more difficult working conditions or lower pay, as can be found in Healthcare (Brugha et al., 2016; Heffron and Socha-Dietrich, 2019), Agriculture and food work (Maher and Cawley, 2016; O'Sullivan and Murphy, 2022), and Construction sectors (Brenner and Ahern, 2000; Bobek et al., 2008; Krings et al., 2011; Roche et al., 2025; Sweeney et al., 2026). This can deter local workers from entering or remaining in these sectors, whereas migrants often become overrepresented. The COVID-19 pandemic further entrenched this effect as the OECD finds; even though certain low-skilled work emerged as essential, the added health risks further decreased the

attractiveness of many low-paid, low-status jobs in the eyes of local workers (Causa et al., 2022; 2024).

Shortages further stem from changing skills needs particularly affecting high-wage sectors and firms (Arpaia and Halasz, 2023; OECD, 2024a; EMN, 2025). The digital transition, for instance, creates novel skills needs and intensifies existing skills demand across the ICT sector (EMN, 2025). Irish research also finds that realising the shift towards modern methods of construction will create new demand for technical, communication, planning, and data analysis skills in the construction field (EGFSN, 2024a; McNaboe et al., 2025b). Analysis by the Department of Finance (2026) finds that demand for AI skills is also accelerating rapidly in Ireland. Yet, understanding the precise effect of AI on the future labour market remains difficult with other research instead highlighting the displacement of certain higher-paid and higher-educated workers (Doorley et al., 2026).

Lastly, the attractiveness of the Irish labour market is constrained by the limited availability and affordability of accommodation, especially in cities such as Dublin (SLMRU, 2025a). The shortage in housing undermines Ireland's ability to effectively attract and retain talent and has become an increasingly important factor shaping labour market pressures (Creaton et al., 2025; OECD, 2025). Irish recruitment companies surveyed by the SLMRU indicated housing costs as a main driver of their recruitment difficulties (SLMRU, 2025a). Housing shortages not only decrease the attractiveness of Ireland as a destination for foreign talent but was also identified as a driver behind the emigration of Irish skilled workers (Creaton et al., 2025).

The impacts of persisting labour shortages are severe

Persisting shortages in the supply of skills and labour can have far-reaching negative consequences for economy and society (OECD, 2024b; EMN, 2025). This includes a decrease in the availability and quality of (public) services, national productivity and innovation as well as an increase in the workload of currently employed workers (European Bank for Reconstruction and Development, 2024).

These wider challenges are also evident in Ireland. The OECD (2025) finds that reducing current labour and skills shortages is important for preserving Ireland's cost competitiveness. In addition, many of Ireland's skills shortages are concentrated in strategically important sectors that are central to the delivery of national development

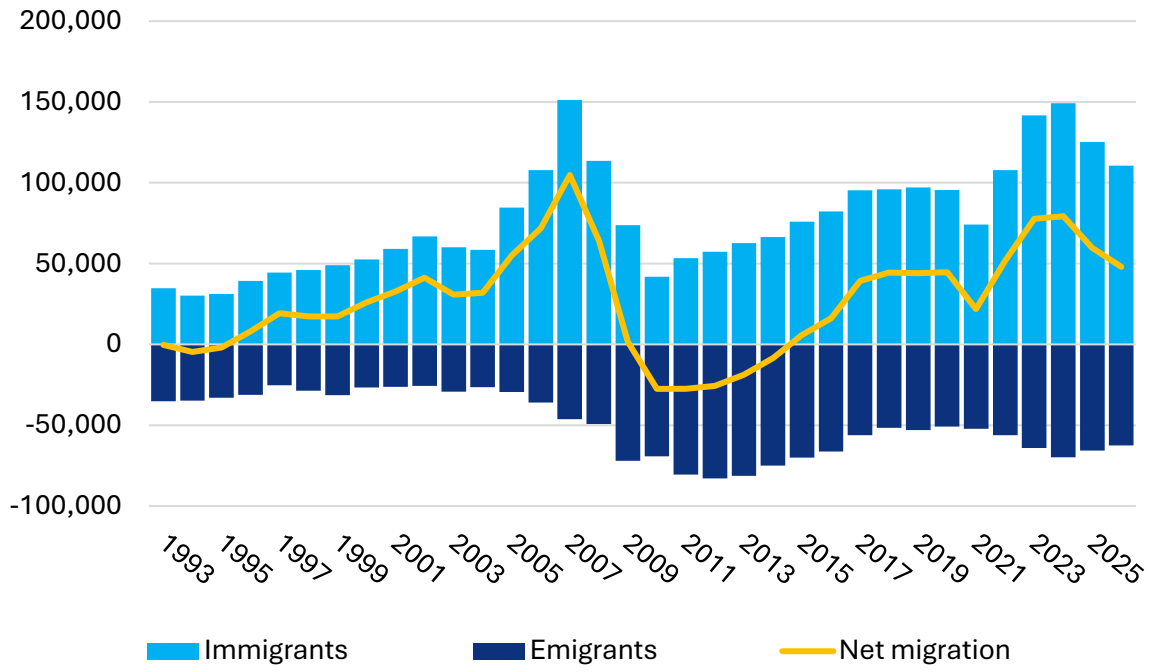
objectives across housing, infrastructure, and healthcare provision (OECD, 2024b; 2025). Work conducted by the Overseas Development Institute, for instance, highlighted the limited availability of labour as the single biggest barrier to delivering Ireland's Housing for All targets (Kumar and Donoghue, 2024). Research commissioned by the Department of Further and Higher Education, Research, Innovation and Science produced similar findings recommending that Government expand apprenticeship and training capacity within the sector and leverage skilled inward migration to meet the urgent workforce needs in construction (DFHERIS, 2026). Similar analyses are available for the Healthcare sector underlining that the limited availability of healthcare assistants in Irish nursing homes and hospitals, for instance, significantly jeopardises the State's ability to provide long-term residential care for older people (KPMG, 2024).

A range of policy tools exists, and may indeed be required, to address such labour and skills shortages including up- and re-skilling, removing retirement-age barriers, and improving wages and working conditions. This report focuses on the immigration of non-EEA workers through the Irish employment permit system as one component of the broader policy response.

1.1.2 Migration context

Ireland is often referred to as a 'new country of immigration' as it historically witnessed a higher number of emigrants than immigrants. This trend only began reversing during the 1990s, a time of significant economic growth in Ireland (Barrett et al., 2016). In 1996, the country experienced for the first time more people moving into the country than away from it. Figure 1.1 shows Ireland's immigration, emigration and net migration over the past 30 years.

Figure 1.1 **Immigration, emigration and net migration in Ireland, 1993–2026 (April-April)**

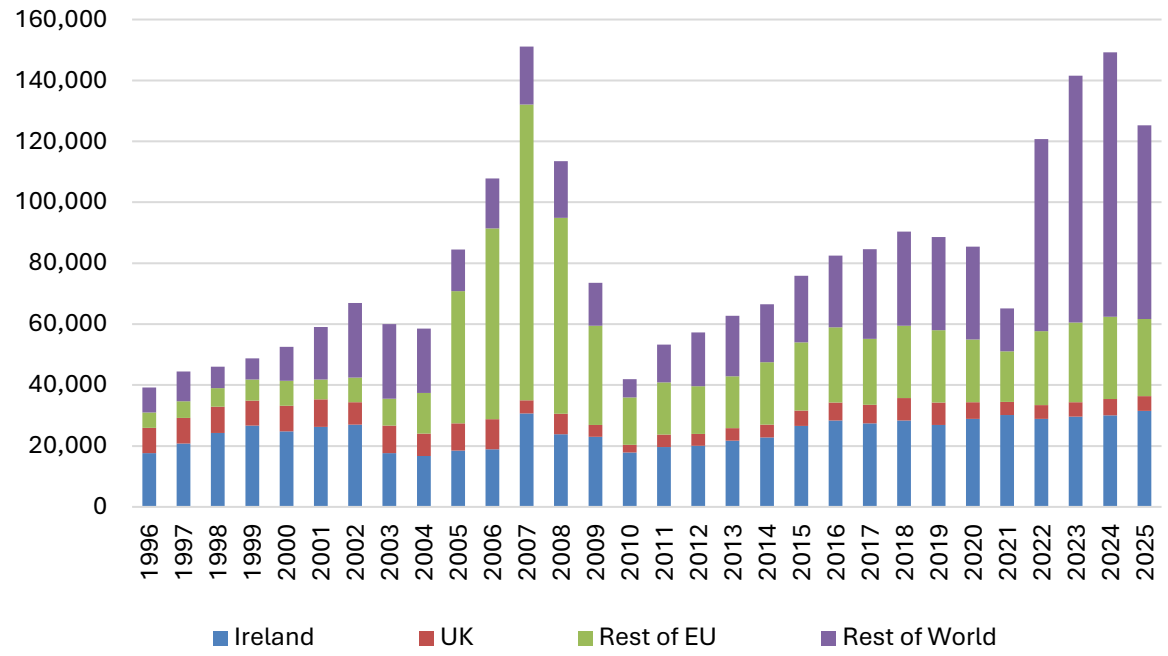


Source: CSO (2026b).

Ireland's migration flows tend to closely follow fluctuations in the economy (Barrett et al., 2016; Creaton et al., 2025). During Ireland's economic boom in 2007, both immigration and net migration peaked with 151,100 immigrants (CSO, 2024). Migration flows subsequently dropped into negatives during the recession of 2008-2011. Since 2015, net migration has turned positive once again growing relatively steadily, consistent with a period of economic recovery. The only exception to this trend occurred during the COVID-19 pandemic due to associated restrictions on international mobility, as can be seen in 2021.

While current immigration numbers have almost caught up with the 2007 peak, net migration has not. This is largely due to an ongoing and growing number of Irish and non-Irish emigrants leaving Ireland to move elsewhere. The increase in 2022 and 2023 can further be attributed, in part, to the influx of persons displaced from Ukraine that received temporary protection beneficiary status in Ireland (Potter et al., 2025).

Figure 1.2 **Immigration flows by broad citizenship group, 1996-2025 (April-April)**



Source: CSO (2026b).

Figure 1.2 takes a closer look at the make-up of Ireland's immigration inflows by highlighting the composition of nationalities since 1996. While immigration from Irish and UK-born nationals has remained relatively stable, clear fluctuation is noticeable in the relative share of nationals from the EU and from the Rest of World.

This fluctuation is particularly distinct when comparing the two peaks occurring around 2007 and around 2022-2024 respectively. From the year 2004 onwards, we see the absolute and relative share of EU nationals increase dramatically and the share of immigrants from the 'Rest of World' decrease slightly. This trend is attributable to two related policy decisions taken around that time. For one, Ireland was one of only three EU countries that granted citizens of the EU's ten New Member States immediate access to the labour market upon 2004 enlargement (Ruhs, 2005; Barrett et al., 2016).[1] Only the UK and Sweden shared this policy while all other EU countries continued to place restrictions on the employment of New Member State nationals. This liberalising policy towards new EU workers manifested itself in a stark increase of immigration from the EU. This policy was counterbalanced with a more restrictive and interventionist approach

[1] The New Member States of the EU are Cyprus, Czechia, Estonia, Hungary, Latvia, Lithuania, Malta, Poland, Slovakia, and Slovenia.

towards the employment of non-EEA workers[2] recruited through the employment permit system (Ruhs, 2005; Quinn, 2010).

Up until 2003, Irish employers were able to recruit non-EEA workers with few restrictions. Roughly speaking, the market dictated the number of employment permits issued whereas the State only intervened in a limited capacity, mainly to license an employment permit after a job offer was made (Quinn, 2010). This changed in preparation for the granting of free movement to new EU Member State workers prompting the passing of the first two Employment Permits Acts, in 2003 and 2006 respectively. These Acts attributed the Irish State a greater role in the selection of foreign workers and introduced a range of requirements that characterise Ireland's economic migration model until today: a mandatory labour market needs test (in certain instances), an ineligibility list excluding certain occupations, and strong limits on the sponsoring of low-skilled roles (Ruhs, 2005; Quinn, 2010). Both policy decisions made it effectively easier and cheaper for employers to recruit Irish and EU workers over non-EEA ones. That impact is visible in Figure 1.2: by 2007, immigration to Ireland had reached its historic peak with 134,000 new immigrants, 97,100 of whom came from other EU countries.

This makeup of nationalities somewhat reversed from 2022 onwards. The graph shows that as the Irish economy began to recover from its recession post-2011, intra-EU immigration did not follow suit and instead remained at relatively stable levels. In contrast, the relative and absolute shares of the 'Rest of World' category grew significantly as employers turned to countries from outside of the EEA to meet their need for labour. The largest ever increase in immigration to Ireland occurred, to date, between 2021 and 2022. Roughly half of immigration inflows that year (63,000 out of 120,700) came from outside of the EU, Ireland and the UK. The share of 'Rest of World' immigrants continued to grow up until 2024 but recorded a slight decrease in 2025 roughly returning to 2022 levels at 63,600.

1.1.3 Labour migration context

There are several ways in which immigrants may access work in Ireland. EEA, Swiss and UK nationals enjoy automatic labour market

[2] Note that the CSO's 'Rest of the world' data category in Figure 1.2 additionally includes the EEA countries Norway, Iceland, and Liechtenstein and is thus not perfectly comparable with the category of non-EEA nationals. Where the report discusses policy, 'non-EEA nationals' is used as the appropriate term.

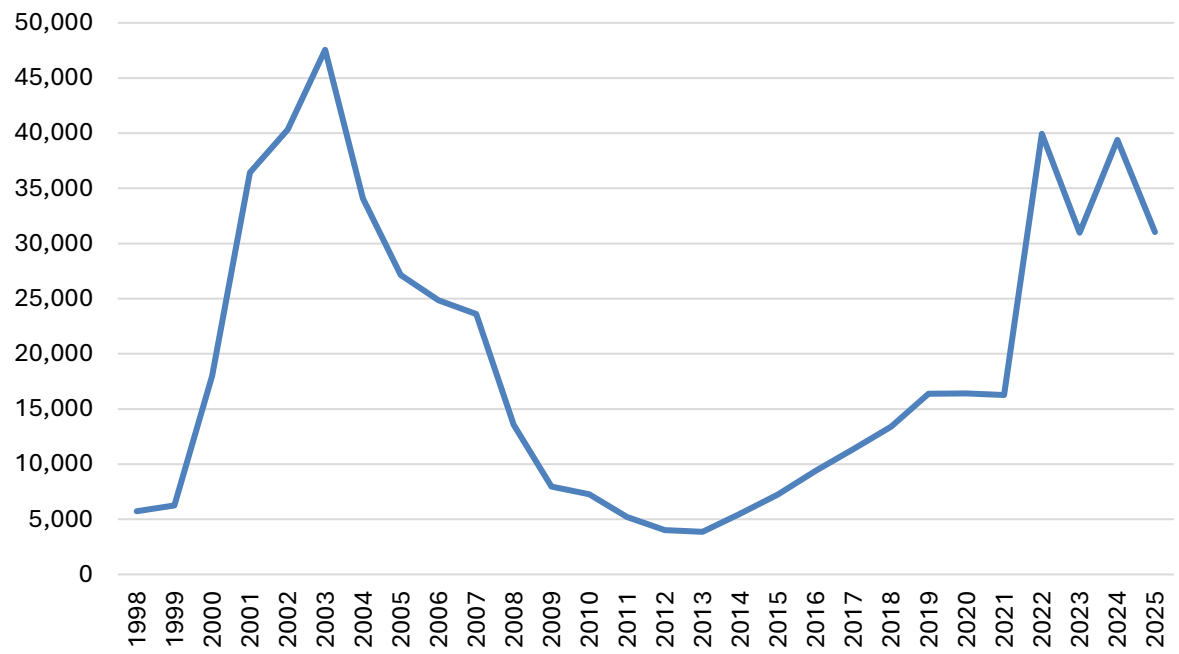
access and may take up work and residency in Ireland without restrictions (Barrett et al., 2016; Privalko et al., 2025). Compared to non-EEA migrants, these groups may work in any occupation and at any skill level. As highlighted above, EEA and UK nationals have historically made up a high percentage of Ireland's immigrant population, though their relative share has declined significantly since the recession (2008-2011). Previous research into the employment activity of EEA nationals highlighted higher employment rates compared to both Irish and to non-EEA nationals working in Ireland (Privalko et al., 2025; McGinnity et al., 2025), as well as higher occupational attainment (Privalko et al., 2025) and better job quality (Laurence et al., 2023). The exception to this trend is migrants from the EU's New Member States. Immigrants from these countries – particularly Polish nationals – are overrepresented in lower-skilled and lower-quality employment (Privalko et al., 2025; Laurence et al., 2023) and experience greater wage penalties (Barrett et al., 2016), despite a relatively high employment rate. While the labour market engagement of EEA nationals is not the focus of this report, it is important to highlight their labour market access conditions to contextualise later policy decisions on the employment permit system.

Non-EEA migrants, in contrast, face distinct restrictions in their access to the Irish labour market largely dependent on their immigration pathway and residency permission. In this report we focus on the specific cohort of employment permit holders. Notably however, there are several other immigration permissions which grant some form of labour market access. This includes, for instance, beneficiaries of international protection and family members of migrant workers. These groups are not especially discussed in this report (with the exception of international students transitioning into the employment permit system, addressed in Section 4.4). While thus beyond the scope of this research, it is important to acknowledge that migrant workers other than employment permit holders also engage with the Irish labour market in significant ways (see, for instance, McGinnity et al., 2018; Arnold et al., 2019; Polakowski and Cunniffe, 2023; McGinnity, et al., 2025; Privalko et al., 2025).

Any employment-based immigration to Ireland is generally facilitated through the employment permit system (DETE, 2018). Applying for an employment permit requires a pre-existing eligible job offer and an Irish employer willing to sponsor the non-EEA national as an employee. Criteria are placed on both employer and employee to ensure

employment permits satisfy labour market needs and do not reduce job opportunities for locals. Employment permits are thus only issued for specific occupations and skill levels. Most foreign workers will receive either the General Employment Permit or Critical Skills Employment Permit, and are then registered on a Stamp 1 immigration permission (see Chapter 4 for more information).

Figure 1.3 Total employment permits issued (including renewals), 1998-2025



Source: DETE (2025e) and Joyce (2012).

Figure 1.3 shows the total number of employment permits issued and renewed in Ireland since 1998. Two peaks, in 2003 and in 2022 respectively, reflect two distinct shifts in Ireland's approach to managing its economic migration policy. The first reflects the lightly regulated approach inherent to the employment permit system in the late 1990s and early 2000s, which was discussed above (Ruhs, 2005; Quinn, 2010).

A second phase emerged as employment permit numbers began to climb again, first gradually from 2014 and then dramatically from 2021 onwards. A key driver of this increase was the return to economic growth after 2011, which made Ireland a more attractive destination for migrant workers and expanded employers' demand for labour (Creaton et al., 2025; Department of Finance, 2025a), but equally so was a response to a clear decrease in intra-EU migration. This meant that employers had to rely more on non-EEA workers to satisfy labour demand where previously those roles were filled by EU workers. The

increase in employment permit issuances can further be contextualised by a moderate yet steady increase in emigration from Ireland (Creaton et al., 2025).

To help address these growing labour market demands, the Department of Enterprise, Tourism and Employment (DETE) introduced changes to significantly widen the range of occupations eligible for an employment permit.[3] In 2021 and 2023, two such expansions took place in response to sustained employer demand and public consultations that resulted in a widening of the Critical Skills Occupations List and a narrowing of the Ineligible Occupations List (Creaton et al., 2025).[4] In light of changing migratory patterns, distinct economic and employment growth, and government decision to liberalise foreign recruitment, the number of employment permits ultimately doubled from 16,275 in 2021 to 39,955 in 2022 (DETE, 2025e).

Immigration through the employment permit system is particularly driven by workers from India, the Philippines and Brazil (DETE, 2026a). Employment permit data published annually by DETE also reveal that certain sectors disproportionally rely on employment permit holders, most notably the Health and social work sector that accounted for a quarter (26 per cent) of all employment permits in 2025. Other prominent sectors are Information and communication activities at 12 per cent, and Accommodation and food services at 11 per cent (DETE, 2025e). Looking at the period 2015-2024 inclusive, both the Health and the ICT sector accounted for almost 60 per cent of all newly issued and renewed permits, albeit ICT with a lower renewal rate (Creaton et al., 2025) – a factor potentially explained by a higher take-up of the Critical Skills Employment Permit in that sector.[5] Chapter 5 discusses available employment permit data in greater detail, among others disaggregated by economic sector, country of origin and company.

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3 Correspondence with DETE, June 2025.

4 Correspondence with DETE, June 2025.

5 Migrants on the Critical Skills Employment permit may transition into the more flexible Stamp 4 immigration permission after two years (as opposed to five years) and are no longer captured by employment permit data at that point.

1.2 Scope and research questions

This report analyses labour immigration as a policy response to, and one solution for, labour and skills shortages in Ireland. It aims to answer two research questions:

1. What is Ireland's legislative and policy framework for addressing labour and skills shortages through non-EEA migration, and how has this framework developed since 2021?

2. What challenges and opportunities exist in meeting Irish labour and skills needs through non-EEA immigration?

The research builds upon the 2025 EMN Study *Labour migration in times of labour shortages* (EMN, 2025). Included are only non-EEA nationals working in Ireland on an employment permit. Migrants arriving for reasons of family reunification or international/temporary protection as well as those migrant workers coming to Ireland from within the EEA, the UK or Switzerland are not discussed. Also excluded from the research scope are non-migration related policies to address labour shortages – such as up- and re-skilling local workers or labour market activation instruments – as well as policies encouraging the return of Irish emigrants to Ireland.

In line with the original EMN Study, the research primarily discusses the attraction of labour and talent to Ireland through the employment permit system. Accordingly, talent retention measures are not specially discussed, however they are touched upon where international students are concerned (whose retention is encouraged through the Stamp 1G job search permission) as well as briefly in the data section in Chapter 5.

1.3 Methods

This report is based on information submitted by the Irish National Contact Point of the EMN to the EMN-wide study *Labour migration in times of labour shortages*. The submissions of National Contact Points from across the EMN are compiled in the EMN synthesis report that was published in November 2025 (EMN, 2025). For the Irish contribution, desk research was conducted, including relevant policy, legislation and academic literature.

Data were additionally collected via two waves of stakeholder interviews. A first wave took place in October-November 2024 with a

view to inform the EMN synthesis study. A second wave of data collection was conducted in preparation for this national-level report in May-July 2025. This was done to complement and expand previously collected information and to develop further points of interest in the national context.

Over the course of the two data collection periods, the following stakeholders were consulted: three units within the Department of Justice, Home Affairs and Migration (DJHAM); the Further Education and Training Agency, SOLAS; the Skills and Labour Market Research Unit based within SOLAS; Chambers Ireland; Business in the Community Ireland (BITC); the Migrant Rights Centre Ireland (MRCI); the Immigrant Council of Ireland (ICI); Doras; the Workplace Relations Commission (WRC); Unite the Union (this representative also held prior experience with the International Transport Workers Federation); and the immigration consultancy Fragomen. Written answers were received from the Economic Migration Policy Unit within DETE.

Interviewees were sent questions in advance which related to their organisation's experience with the employment permit system and labour migration to Ireland, as well as challenges and good practices therein. Interview data were subsequently analysed thematically based on the research questions and the results of the literature review. The draft report was sent to all interviewees in May 2026. Written observations and data were subsequently received from DETE, SOLAS, DJHAM, WRC, Unite the Union, ICI, MRCI, Fragomen and the WRC. The temporal scope of the EMN-wide study was 2021 to 2024. This national-level report additionally considers the year 2025.

1.4 Structure of the report

The remainder of the report is structured into six chapters. Chapter 2 discusses how the Irish government identifies labour and skills shortages giving an overview of the main sectors, occupations, and skills affected. Chapter 3 outlines Ireland's economic migration policy framework and its guiding principles, placing special emphasis on the recently passed *Employment Permits Act 2024*. A more operational overview of the employment permit system is offered in Chapter 4 highlighting its main mechanisms, requirements, and permit types. Chapter 5 analyses and interprets several available data sources on the use and distribution of employment permits in Ireland. Chapter 6 aims to bring these various pathways and instruments together in a

discussion of overall good practices and challenges when using the immigration of foreign workers to meet demand for labour and skills. Chapter 7 concludes the report by reflecting on the limitations and broader policy implications of the research findings.

Chapter 2

Identifying labour and skills shortages in Ireland

A range of methods is used to identify labour and skills shortages in the Irish economy. These methods include quantitative metrics such as the vacancy rate as well as more qualitative indicators included in the National Skills Bulletin, the difficult-to-fill vacancy survey and other sector-specific analyses associated with the work of the Skills and Labour Market Research Unit (SLMRU) within SOLAS. This chapter defines labour and skills shortages, discusses how they are identified in Ireland, and concludes with an overview of affected sectors, occupations and skills.

2.1 Defining labour and skills shortages

Currently, there is no global or EU-wide accepted definition of what precisely constitutes a labour shortage (EMN, 2025). Across the European Migration Network (EMN), countries use varying terms and definitions to describe situations in which demand for labour exceeds supply (EMN, 2025). Typically, the literature defines it as a national shortage of a particular type of labour for which the number of vacancies has been (or is expected to be) above a level considered normal turnover at current wage levels (Arpaia and Halasz, 2023). The Irish Government defines it as a situation in which there is an insufficient number of individuals willing or available to take up employment opportunities (Government of Ireland, 2018).

Most EMN Member and Observer countries additionally distinguish ‘skills shortages’ as a distinct subset of labour shortages emerging in medium or highly skilled professions (EMN, 2025). While the distinction is common, it is not without contestation, as the concept of ‘skills’ can be analytically ambiguous (EMN, 2020b; Anderson and Ruhs, 2012). Accordingly, ‘skills’ may refer to the level of education required, the tasks involved in executing a particular job (Cedefop, 2018), or an overall combination of education, skills and abilities (OECD, 2018; EMN, 2020b). In Ireland, ‘skills shortages’ refer to situations in which there is an insufficient number of trained/qualified workers domestically to meet demand (Government of Ireland, 2018).

The skills/labour distinction is frequently incorporated into national labour immigration systems as many countries will – to some degree – offer different admission, residency, or employment conditions to

migrant workers according to skill level (Devitt, 2024; EMN, 2025). Generally, low-skilled admission programmes are more likely to be temporary in nature, most notably in the context of seasonal employment (Castles, 2006; Ruhs, 2013; Boucher and Gest, 2018). As Chapter 4 discusses in greater detail, such a distinction is also drawn in the Irish employment permit system. Migrant workers holding 'critical skills' may be granted the Critical Skills Employment Permit providing access to more favourable terms such as higher remuneration thresholds and more flexible employment conditions.

2.2 Identifying labour and skills shortages

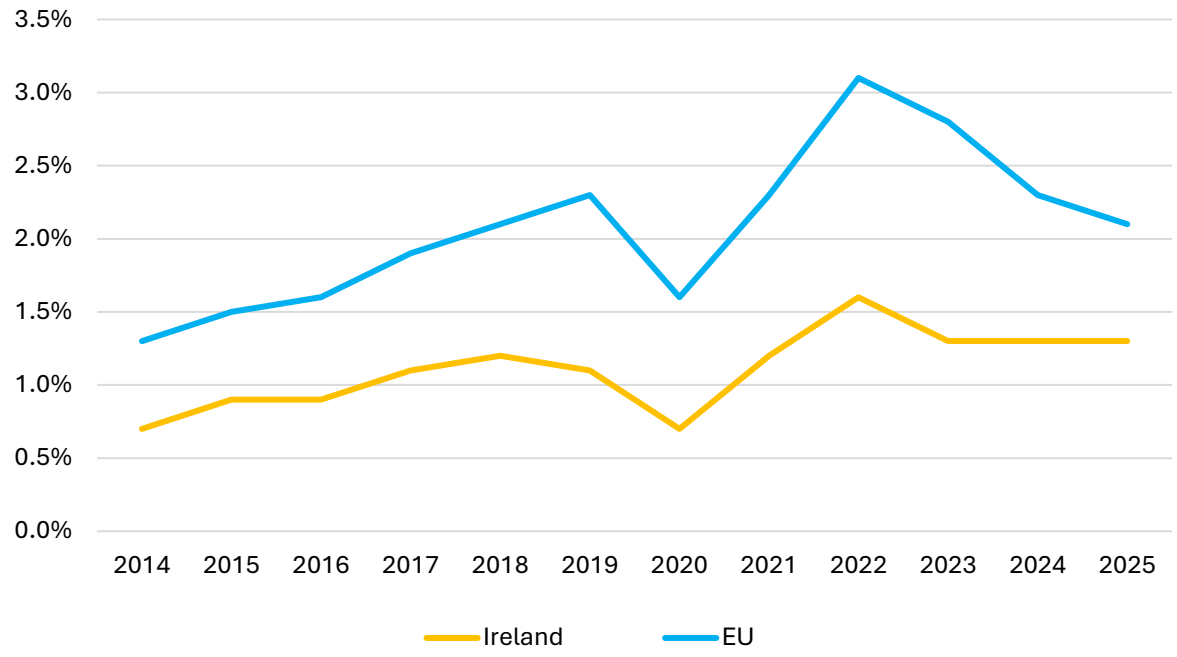
Across the EMN, states use a range of measures and tools to identify whether and how their labour markets are affected by a shortage in labour and skills (EMN, 2025; Arpaia and Halasz, 2023). This is also the case in Ireland.

Job vacancy rate

The most common quantitative metric is the job vacancy rate (OECD, 2024a; EMN, 2025) which describes the share of unfilled jobs relative to all jobs in a given labour market (Arpaia and Halasz, 2023). A high vacancy rate thus indicates a high share of unfilled vacancies.

Figure 2.1 shows the vacancy rates of Ireland and the EU since 2014. In 2025, the average rate across the EU amounted to 2.1 per cent (EMN, 2025), and in Ireland to 1.3 per cent (CSO, 2026a). As the figure illustrates, economic recovery after the pandemic generally led to an increase in labour shortages as the annual job vacancy rate in most EMN Member Countries was higher than in the years prior to 2019 (EMN, 2025). Part of this increase declined again in 2025, resembling pre-pandemic levels more closely. Fluctuations in the Irish vacancy rate remained more modest over the years ranging between a low of 0.7 per cent (2020) and a high of 1.6 per cent (2022) (CSO, 2026a).

Figure 2.1 Job vacancy rate in Ireland and the EU, 2014-2025 (Q2-Q2)



Source: CSO (2026a) and Eurostat (2026c).

Importantly, the job vacancy rate is commonly interpreted alongside other indicators such as the unemployment and participation rate to give a more comprehensive picture of labour market tightness and shortages (Eurostat, 2026b). Accordingly, in labour markets with few unemployed persons, job vacancies may be comparatively more difficult to fill as the pool of workers (with the right skill-set) is smaller. This is the case in Ireland: while a vacancy rate of 1.3 per cent is low compared to the EU average, the supply of workers nationally is more constrained, as demonstrated by a low unemployment rate (5 per cent compared to an EU average of 6 per cent) and a high participation rate (83 per cent compared with an EU average of 80 per cent) (Eurostat, 2025; 2026a). Accordingly, there are fewer unemployed and inactive workers that may be matched with an open vacancy or activated into the labour force to fill those vacant posts, making labour and skills shortages a more likely outcome.

In absolute terms, there were 29,500 unfilled vacancies found across all sectors in Ireland as of 2025 (Q2). Sector-specific vacancy data reveal how severely particular industries are affected by unmet demand for labour. In absolute terms, the Public administration and defence sector emerges as the most affected at 8,900 vacancies (with a vacancy rate of 4.8 per cent) followed by Professional, scientific and technical services at 3,000 vacancies (1.9 per cent), Finance,

insurance and real estate at 2,700 vacancies (2.2 per cent), and lastly both Education as well as Human health and social work at 2,500 vacancies each (with a rate of 1.1 per cent and 0.7 per cent respectively) (CSO, 2026a).

Other shortage indicators

In addition to this high-level view of labour shortages, countries use additional labour market analyses, projections, vacancy assessments and employer surveys to identify which specific skills and occupations are most affected (EMN, 2020b; 2025).

In most EMN Member Countries, including Ireland, employers tend to be closely involved in these processes (EMN, 2025). This is not without criticism, as discussed for instance in Ruhs and Anderson (2010). Relying too heavily on employers' input may distort the picture of where genuine shortages lie, as their assessments generally reflect hiring difficulties at prevailing wage and working conditions. Employers may also favour recruiting migrant workers over adjusting pay, job quality or training, which can further skew the identification of genuine labour shortages (Ruhs and Anderson, 2010). In light of these limitations, a combination of different methodologies and metrics is generally recommended (Ruhs and Anderson, 2010; EMN, 2020b).

In Ireland, the mandate to research, identify, and forecast skills and labour needs lays with two entities: the Skills and Labour Market Research Unit (SLMRU) situated within SOLAS,[6] and an independent advisory body called the Expert Group on Future Skills Needs (EGFSN)[7] (DFHERIS, 2023). While the SLMRU's main task is to provide information, research and data, the EGFSN is additionally tasked to advise Government on how to best resolve national skills needs (DFHERIS, 2023). A range of Departments, government bodies and agencies subsequently draw on this research to inform policymaking across the fields of labour, education and migration (see Section 3.1.1 for an overview of all relevant policy actors).[8] Three types of research outputs are particularly relevant to the identification of labour

6 SOLAS is Ireland's Further Education and Training Agency accountable to the Minister of Further and Higher Education, Research, Innovation and Science.

7 The EGFSN's secretariat sits within the Department of Enterprise, Tourism and Employment.

8 Correspondence with SOLAS, June 2025.

shortages; The National Skills Bulletin, the difficult-to-fill vacancies survey, and sectoral studies.[9]

The **National Skills Bulletin (NSB)** provides an overview of the Irish labour market at occupational level (McNaboe et al., 2025a).[10] The NSB is the most comprehensive of the SLMRU's reports giving insight into a range of economic and labour market indicators with emphasis on demand for skills, difficult-to-fill vacancies, and overall employment outcomes (McNaboe et al., 2025a). The NSB is one of several resources used to inform which occupations should be made eligible for an employment permit.[11] One chapter of the NSB analyses job vacancy data based on the CSO's job vacancy rates and numbers by sector, job vacancy advertisement data provided by the Department of Social Protection (jobsireland.ie) and by Eurostat/Cedefop, and data generated by the SLMRU's own difficult-to-fill vacancies survey (McNaboe et al., 2025a). Drawing on multiple sources to capture job vacancy data is essential, as each source captures only segments of the labour market and comes with its own limitations (Gusciute et al., 2015). For example, online job advert data tend to overrepresent highly skilled occupations: according to the SLMRU, 57 per cent of postings on Irish advertisement sites are for high-skilled roles, compared with only 47 per cent of total employment in Ireland (McNaboe et al., 2025a).

The NSB further provides occupational profiles containing a rich analysis of employment across 16 occupational groups (McNaboe et al., 2025b). Within these groups, the SLMRU classifies current (or potential future) occupation-specific labour or skills shortages each year (McNaboe et al., 2025b). These classifications are informed by a range of evidence for a given occupation including employment changes, job vacancy and announcement data, current volume of employment permits, skill and qualification requirements, as well as overall attractiveness of the job (especially relevant for lower-skilled roles).[12]

The SLMRU also administers an annual **difficult-to-fill vacancies survey** to recruitment agencies and employers across Ireland (SLMRU,

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9 All of the SLMRU's publications are available on SOLAS' website: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

10 Correspondence with SOLAS (A), June 2025.

11 Interview with SOLAS (A), June 2025.

12 Correspondence with SOLAS, June 2025.

2025a). This publication gathers the views of selected Irish recruitment agencies as to which vacancies are proving difficult to fill. The survey further captures changes in skill requirements, hiring and retention practices, job attractiveness, and the profiles of applicants and employees (including the share of Irish and non-Irish candidates) (SLMRU, 2025a).

Lastly, the EGFSN publishes **sectoral studies** which analyse the current and future skills requirements in particular sectors.[13] The topic selection for these studies is decided annually under the EGFSN work programme (Gusciute et al., 2015), generally providing a more in-depth, qualitative analysis of skills, occupations, professions and qualifications in response to emerging information needs. The most recent sectoral studies, published in 2024, addressed skills needed for the transitions to modern methods of construction (EGFSN, 2024a), skills for international financial services (EGFSN 2024b), and skills requirements in the biopharma industry (EGFSN, 2024c).

2.2.1 Occupations in shortage

Since 2021, labour demand has grown particularly for roles in personal services and in the skilled trades. Job vacancy data[14] reveal that the relative demand for personal services – which include, for instance, healthcare assistants, care workers and early years teachers – grew from 14 per cent to 41 per cent between 2021 and 2025. The share of vacancies in the skilled trades grew from 15 per cent to 27 per cent in the same period for roles such as chefs, welders, butchers and mechanics (McNaboe et al., 2021; McNaboe et al., 2025a). The relative share of vacancies decreased across professional roles (e.g. engineers, lecturers, ICT specialists), operatives (e.g. meat processing operatives and HGV drivers) as well as in sales (e.g. sales assistants, stock takers, call centre agents).

Evidence of high labour demand is a necessary but not sufficient condition for a classification as a shortage occupation. In their analysis, the SLMRU also considers the domestic supply of skills, employer input, evidence of job churn, the average age of workers and

[13] All relevant publications, including sectoral studies, are available on the EGFSN's website: https://www.skillsireland.ie/publications/

[14] Note that the data presented here refer to the share of certain vacancies relative to all vacancies and differs from the job vacancy rate (which indicates the share of vacant job posts relative to all jobs).

hours worked, and overall attractiveness of the job.[15] Notably also, the volume of employment permits issued for an occupation is considered in that process. The SLMRU's classification of shortage occupations directly informs, but is not identical to, DETE's Critical Skills Occupations List (see 4.1.1 for more information on the latter).

In 2025, the SLMRU identified 19 shortage occupations across the Irish labour market. Table 2.1 gives an overview of these disaggregated by broad occupational group (McNaboe et al., 2025b). All shortages are occupation-specific, meaning that only certain occupations within a given group are in shortage while others may remain unaffected. For some roles, the analysis remained inconclusive. The SLMRU further specifies whether the shortage is one of skills or of labour.

Table 2.1 Labour and skills shortages per occupational group in 2025

Occupational group	Skills shortage	Labour shortage	Inconclusive
Science & engineering occupations	• Analytical, process and medical scientists • Quality control/assurance, process, and design engineers • Engineers (mechanical, electrical, automation) • Maintenance/manufacturing/ lab technicians	No	• Environmental/ conservation specialists
ICT occupations	• Software developers/engineers • IT analysts/engineers	No	No
Business & financial occupations	No	No	No
Healthcare occupations	• Medical practitioners • Nurses	No	• Therapy professionals • Other healthcare professionals (e.g. dentists, pharmacists, psychologists)
Education occupations	• Subject-specific secondary teachers	No	No
Social & care occupations	• Healthcare assistants	• Care worker	No
Legal & security occupations	No	No	No

Contd.

[15] Correspondence with SOLAS (A), June 2025.

Table 2.1 Continued

Occupational group	Skills shortage	Labour shortage	Inconclusive
Construction occupations	• Civil engineers and construction project managers • Quantity surveyors • Carpenters • Plumbers (future shortage)	No	• Construction operatives • Construction-related technicians
Other craft occupations n.e.c.	• Welders/fabricators • Electricians (future shortage)	No	• CNC programmers
Agriculture & animal care occupations	No	No	No
Hospitality occupations	• Chefs	No	No
Arts, sports & tourism occupations	No	No	No
Transport & logistics occupations	• HGV drivers • Bus and coach drivers	No	• Stock control, transport and distribution admin
Administrative & secretarial occupations	No	No	No
Sales, marketing & customer service occupations	No	No	No
Operatives & elementary occupations n.e.c.	No	No	No

Source: Skills and Labour Market Research Unit (McNaboe et al., 2025b).

Note: The table specifies where the SLMRU identified a labour or skills shortage for a specific role per occupational group. Where no shortage was identified the table specifies 'No' for that group. N.e.c = not elsewhere classified.

Most shortages can be found across the science and engineering fields, construction and craft occupations, information and communication, as well as in health and social care, education, and transport. Notably, the SLMRU predominantly identified skills shortages as opposed to labour shortages. This suggests that many of the Irish shortage occupations require a certain level of pre-existing training or specialisation to execute them. Only the role of care worker was identified as a labour shortage. While the SLMRU is unable to quantify the severity of each shortage, the insufficient supply of labour and skills in these occupations generally demands for policy intervention (McNaboe et al., 2025b). While this report focuses exclusively on labour immigration, labour and skills shortages may also be addressed through measures such as up- and re-skilling, improvements in pay and working conditions, and changes to retirement policies. In practice, these approaches are generally viewed as complementary, with effective labour market policy typically

requiring a combination of policy measures (Ruhs and Anderson, 2010; McNaboe et al., 2025b).

Broadly speaking, shortage occupations have not changed significantly between 2021 and 2025 (McNaboe et al., 2021; McNaboe et al., 2025b).[16] Some new additions can be found in the Construction sector, namely for civil engineers, construction project managers as well as for carpenters. Similarly, the role of care worker, subject-specific secondary teacher, electrician, and maintenance/manufacturing/ lab technician were only recently included as shortage occupations. In contrast, a smaller number of occupations saw their classification as shortages removed, as was the case for two ICT roles as well as for an accountant role in the business and financial occupations.

Specific sectoral analyses further suggest that future skill demand in the biopharma industry (EGFSN, 2024c), and Construction (EGFSN, 2024a) and Healthcare sectors (KPMG, 2024) is likely to intensify. For instance, the EGFSN estimates that shifting towards modern methods of construction will create new demand for technical, communication, planning, quality control, and data analysis skills within the Irish Construction sector (EGFSN, 2024a; see also Kumar and Donoghue, 2024). Similarly, research commissioned by the Department for Enterprise, Tourism and Employment found that demand for healthcare assistants in Irish nursing homes is likely to intensify over the coming years due to growing demand for the long-term residential care of older persons (KPMG, 2024). These findings suggest that the challenge for Ireland lies less in the overall scale of labour shortages but rather in their concentration in strategically important sectors, where sustained skills shortages may constrain government's ability to deliver on policy commitments across housing, infrastructure, and healthcare.

[16] Note: in 2024, the SLMRU reviewed the range of occupations included in each of the 16 groupings. Accordingly, the 2025 data are not perfectly comparable with that of previous editions of the National Skills Bulletin (McNaboe et al., 2025b).

Chapter 3

Ireland's economic migration policy framework

Several State actors take part in the design of Ireland's economic migration policy framework. While the Department of Enterprise, Tourism and Employment (DETE) holds primary responsibility for this policy realm, a range of other departments, agencies, and advisory bodies make important contributions. Their relationships and main avenues of coordination are presented in the first part of this chapter (Section 3.1). The remaining sections explain how this framework is regulated via primary and secondary legislation focusing on the Employment Permits Act and its accompanying Regulations (Section 3.2.1). Both underwent significant reform in 2024 and 2025 with the intention to modernise the system and increase its ability to respond flexibly to emerging labour market needs. Attention is also given to a small number of national and EU-level labour migration initiatives outside of the employment permit system (Section 3.2.2) as well as to the specific legislative provisions safeguarding migrant workers in Ireland (Section 3.2.3).

3.1 Governance structure

3.1.1 Key actors

The Department of Enterprise, Tourism and Employment (DETE) holds responsibility for designing and implementing Ireland's economic migration policy via the employment permit (EP) system. It does so via its Economic Migration Policy Unit (EMPU) on the one hand – tasked to develop all aspects regarding policy – and the Employment Permits Unit on the other – managing the employment permit system operationally and logistically.[17]

The mandate for governing all remaining aspects of immigration, integration and asylum lies with the Department of Justice, Home Affairs and Migration (DJHAM). DJHAM holds responsibility for Ireland's wider migration and integration policy, and as such is concerned with policies governing the labour market integration of migrants outside of the employment permit system, including that of beneficiaries of

[17] Correspondence with DETE, July 2025.

international and temporary protection, international students, and of family members.[18]

The Department of Further and Higher Education, Research, Innovation and Science (DFHERIS) is tasked, among others, to ensure Irish policy on skills training and education provision are sufficiently aligned with policies on labour immigration.[19]

Similarly, the Department of Social Protection may become involved in the realm of economic migration policy to ensure it effectively complements efforts on the labour market activation of unemployed or otherwise disadvantaged groups in the Irish workforce (Department of Social Protection, 2020).

Other government departments may have input on Ireland's economic migration policy, typically where a particular sector or industry requires the immigration of international talent to address its skills needs. In the past, this applied to the Department of Agriculture, Food and the Marine, the Department of Transport, and the Department of Health.[20]

State agencies

Other notable actors within the Irish skills and labour market infrastructure are the state agencies SOLAS and Workplace Relations Commission (WRC), operating under the remit of DFHERIS and of DETE respectively. SOLAS is Ireland's Further Education and Training Agency; its Skills and Labour Market Research Unit (SLMRU) is a key entity responsible for gathering data on the supply and demand of skills in the Irish labour market (see Chapter 2) (Quinn, 2010). The SLMRU's research is published through various reports most importantly via the annual National Skills Bulletin. Their findings are used by DETE and other departments to inform policymaking across a range of issues in response to national labour and skills needs.[21] This includes, but is not limited to, Irish employment permit policy. The WRC is the Irish state agency responsible for ensuring compliance with all employment legislation which includes the Employment Permits Act and Regulations.[22]

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18 Correspondence with DJHAM C, June 2025.
19 Interview with SOLAS (A), June 2025; Interview with SOLAS (B), June 2025.
20 Correspondence with DETE, July 2025.
21 Interview with SOLAS (A), June 2025; Interview with SOLAS (B), June 2025.
22 Interview with the WRC, July 2025.

Advisory bodies

Three advisory bodies may make recommendations to Government on how to best resolve national labour and skills needs. These are the Expert Group on Future Skills Needs (EGFSN), the National Skills Council, and the Labour Market Council. The EGFSN is an independent, non-statutory body established in 1997 to advise Government on future skills needs and associated labour market issues. In doing so, it draws heavily on research from the SLMRU, as well as on the expertise of its members consisting of different government departments (DETE and DFHERIS) and state agencies (SOLAS, Enterprise Ireland, IBEC, the Higher Education Authority, and IDA Ireland) (EGFSN, 2026). The EGFSN's recommendations are expressed and formalised via publication of expert reports, often responding to industry-specific needs.[23] Its work programme is managed by DETE and financed through the National Training Fund.

The National Skills Council is a newer addition to Ireland's national skills infrastructure dating back to the adoption of a new National Skills Strategy in 2016 (Department of Education and Skills, 2016). It receives oversight from the national skills unit within DFHERIS. In contrast to the EGFSN, members of the National Skills Council are drawn largely from the business community, in addition to relevant government departments and agencies. The National Skills Council collaborates with and complements the work of the EGFSN via frequent exchange. For instance, the current EGFSN chair is simultaneously expert advisor to the National Skills Council.[24]

A third Labour Market Advisory Council is appointed and overseen by the Department of Social Protection. Since 2013, this council convenes members of industry as well as labour market experts that advise the Government on the efficient operation of the Irish labour market (Department of Social Protection, 2020). The Labour Market Advisory Council, for instance, oversees implementation of the Pathways to Work strategy and aims to inform future labour market and employment policy. As such, this advisory council – similar to the other two – assumes a role in informing the employment permit system with a view to complement policies on maintaining low unemployment

23 Interview with SOLAS (A), June 2025.
24 Interview with SOLAS (A), June 2025.

levels and increasing labour participation rates within the Irish population.[25]

3.1.2 Avenues of policy coordination

The above actors convene and coordinate via various formal and informal policy coordination to advance policymaking on labour immigration in Ireland.

The Interdepartmental Group on Economic Migration Policy

The most important formal mechanism in this regard is the Interdepartmental Group on Economic Migration Policy (IDG). The IDG was first convened in 2018 to oversee a comprehensive review of Ireland's economic migration policy and has remained in place to oversee implementation of its recommendations since.[26] It continues to monitor the operation and updating of the employment permit system in line with these recommendations and other guiding principles on an ongoing basis. Crucially, the IDG oversees the periodic reviews of the Critical Skills Occupations List and the Ineligible Occupation List. The IDG met for the most recent of these reviews in November 2025, the recommendations of which were published in May 2026.[27]

The group is composed of key government departments including, among others, Department of Enterprise, Tourism and Employment (DETE), Department of Justice, Home Affairs and Migration (DJHAM), Department of Social Protection (DSP), Department of Further and Higher Education, Research, Innovation and Science (DFHERIS), Department of Education and Youth, the Department of Health, as well as the SLMRU. Members provide observations across a range of employment and migration-related topics in line with their respective expertise. The broad membership of the group is thus intended to capture the policy complexity and wide-ranging implications of Ireland's labour and skills demands.[28] According to DETE, this aims to ensure that employment permit policy is formulated complementarily to policy on the upskilling and re-skilling of the local population as well as on wider immigration priorities.[29]

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25 Interview with SOLAS (A), June 2025.
26 Correspondence with DETE, July 2025.
27 Interview with SOLAS (A), June 2025; Correspondence with DETE, May 2026.
28 Correspondence with DETE, July 2025.
29 Correspondence with DETE, July 2025.

The Strategic Migration Policy Group

Noteworthy is also the more recently formed Strategic Migration Policy Group under the remit of DJHAM. This inter-departmental working group was established to develop a whole-of government approach to migration that is coherent across departments and can address Ireland's current and future demographic, economic and social policy needs.[30] It also acts as an oversight group to the development of the National Migration and Integration Strategy. This strategy will detail how Government intends to meet the demands and the opportunities facing Ireland's society and economy over the next decade.[31] It includes members across seven Departments[32] and met for the first time in January 2025 aiming to convene every 4-6 weeks. The group looks at migration policy broadly rather than at economic migration specifically. DJHAM also highlighted the long-term and future oriented outlook of the group that can be contrasted with the more short- and medium-term view inherent to the employment permit system.[33] Lastly, the labour market integration of migrants that work in Ireland but are not employment permit holders, such as refugees and international students, fall under the remit of DJHAM and thus the Strategic Migration Policy Group.[34]

Public consultation fora

Public consultation fora additionally inform policy formulation on economic migration. Requests for submissions can be initiated by DETE on any aspect of labour migration policy but occur more routinely as part of the periodic review of the occupations lists and the pre-legislative scrutiny of proposed bills and reforms, as was the case for the Employment Permits Bill that preceded the 2024 Act. The periodic reviews of the Critical Skills and Ineligible Occupations Lists also involve a public consultation stage (explained in more detail in Chapter 4).

Through these consultations, the opinion and needs of a broad range of stakeholders is captured, traditionally including representatives

30 Correspondence with DJHAM, July 2025.
31 Correspondence with DJHAM, May 2026.
32 These are: Department of Justice, Home Affairs and Migration; Department of Enterprise, Tourism and Employment; Department of Further and Higher Education, Research, Innovation and Science; Department of Housing, Local Government and Heritage; Department of Social Protection; Department of Finance, and the Department of the Taoiseach.
33 Interview with DJHAM (C), June 2025.
34 Interview with DJHAM (C), June 2025.

from industry, employers and employees, non-governmental organisations such as migrant rights advocates, trade unions, as well as other government departments relevant to the particular aspect of economic migration under discussion. During a comprehensive review of Ireland's economic migration policy in 2018, approximately 500 stakeholders participated and provided submissions on the proposal (Government of Ireland, 2018).

3.2 Legislative and policy framework

According to DETE, the overall aim of Ireland's economic migration policy is to maximise the benefits of labour immigration while minimising disruptions to the local labour market (DETE, 2025c).[35] The primary, long-term goal of national policy is to create high-skilled jobs for the resident population and promote the sourcing of labour from within Ireland and the EEA. Only where this is not possible, the employment permit system is used to recruit non-EEA nationals for in-demand skills and shortage occupations.[36] As such, the Government utilises labour immigration as a short- and medium-term measure forming one part of Ireland's overall response to labour and skills shortages.[37] Immigration should thus never replace the critical work of up- and re-skilling the domestic workforce.[38]

Ireland operates a distinctly demand-driven, employer-led labour immigration system.[39] This means that EPs are granted in direct response to the arising labour needs of businesses, and require an existing job offer. Demand-led systems are contrasted with supply-driven ones (also called points-based or human capital systems) traditionally more associated with countries outside of the EU such as Australia or Canada. These countries may admit individuals holding particular skills even where they do not hold a job offer prior to arrival (Devitt, 2024).

In the EU, demand-led labour immigration systems are the clear norm with 16 out of 23 EMN Member Countries exclusively relying on this approach (EMN, 2025). A minority of EMN countries[40] use a mix of

35 Correspondence with DETE, June 2025.
36 Correspondence with DETE, June 2025.
37 Interview with SOLAS (A), June 2025; Interview with DJHAM (C), June 2025.
38 Correspondence with DETE, June 2025; Correspondence with SOLAS, June 2025.
39 Correspondence with DETE, June 2025.
40 EMN Member States using mixed approaches are Belgium, Bulgaria, Croatia, France, Germany, Slovakia and Spain.

demand-led approaches which include supply-based elements (EMN, 2025). Germany, for instance, operates a demand-led approach, but additionally uses smaller, supply-driven mechanisms like the newly introduced, points-based 'Opportunity Card' where an existing job offer is not a prerequisite if certain skill requirements can be met (EMN, 2025).

A key underlying rationale of the Irish policy is adherence to the EU community preference principle (DETE, 2025c). While not exclusive to the realm of migration policy, this principle requires Member States to give preference to the community of EU nationals (as well as to EEA and Swiss workers) over third country nationals in filling vacancies (Robin-Olivier, 2016). Community preference has been a guiding force of Irish labour immigration policy and is reflected in policy tools such as the labour market needs test and the 50:50 rule (see Chapter 4). Key characteristics of the Irish economic migration policy are thus giving preference to the resident Irish and EEA population in addition to ensuring that employment permits are issued in direct response to labour and skills demand.

3.2.1 Employment Permits Act and regulations

Irish economic migration policy framework is regulated and operationalised through the Employment Permits Act[41] and its associated Regulations. In June 2024, the government passed a new *Employment Permits Act 2024* which entered into effect in September of the same year. The Act constitutes the largest reform of the Irish employment permit system since 2006 and replaces the *Employment Permits Act 2003* and *Employments Permit Act 2006*. It applies to all non-EEA nationals who seek to take up employment and residency in the Republic of Ireland and who do not yet hold an immigration status[42] permitting labour market access.[43]

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41 *Employment Permits Act 2024* (No. 17 of 2024), commenced by 'S.I. No. 443/2024 - *Employment Permits Act 2024* (Commencement) Order 2024'.

42 Non-EEA nationals residing in Ireland that do not require a separate employment permit include, for instance, Stamp 4 holders (e.g. refugees and spouses/partners of Irish and EU citizens), Stamp 1G holders (e.g. spouses/de facto partners of non-EEA nationals working in Ireland), and Stamp 2 holders (international students enrolled in English language, undergraduate, or postgraduate courses in Ireland).

43 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

The Act consolidated and updated existing employment permit law.[44] The introduced changes are intended to increase the attractiveness of Ireland as a destination for foreign talent, according to the Department (DETE, 2024a). The Act was accompanied by simultaneous reforms to its secondary legislation, the *Employment Permits Regulations 2024*.[45] Many operational aspects previously associated with the Act were moved to these Regulations which makes it easier to enact future amendments in case of changing labour needs.[46] The Employment Permit Regulations set the process, criteria, rights and application fees for employment permits. The following amendments were enacted to both pieces of legislation in 2024 and 2025:

- Holders of the General EP and Critical Skills EP can now apply to **change employers** after nine months of working in the State on their first permit.[47] The Act eliminated the previous obligation to apply for a new permit and conduct a new labour market needs test where an employee sought to change employer (DETE, 2024a). Notably, General EP holders may only change employer within the same role for which their initial permit was granted, while Critical Skills EP holders may change within a broader category of occupations (i.e. within their relevant SOC code).[48] According to DETE, the added flexibility for Critical Skills EP holders is grounded in the high demand for their skills in the Irish labour market (DETE, 2025a). For all workers, the permit must be valid for at least two months at the time of the application, and the duration of the original permit remains unaffected by a change of employer (DETE, 2025a). In exceptional circumstances, such as fundamental changes to the employment relationship or in cases of exploitation, a change of employer process may also be initiated within the first nine months of employment on the first permit. The nine-month criterion does not apply to workers on their second or subsequent permit. This new provision aims to strike a balance between meeting the employer's expectation that workers will remain within their employment for a

44 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

45 Employment Permits Regulations 2024, SI No. 444/2024.

46 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

47 *Employment Permits Act 2024* (No. 17 of 2024), commenced by 'S.I. No. 443/2024 - *Employment Permits Act 2024* (Commencement) Order 2024'.

48 Minister for Justice (26 September 2024). 'Written response to Parliamentary Question 46 on 'Work Permits'.

reasonable period, and not unduly binding migrant workers to their employer, according to DETE (DETE, 2025a).

- The Act also removed the need to apply for a new employment permit in other circumstances. Employees are now awarded **greater flexibility within their current roles** – primarily in cases of promotion or internal transfer – without requiring a new permit, as long as their duties involve the same skill-set (DETE, 2024a). Similarly, holders of the General EP working as non-consultant hospital doctors (registered on a Stamp 1H) can now be issued a single, multi-site permit when accepting consecutive six-month contracts across different healthcare facilities. Previously, each contract required a separate permit. The Act also allows the Minister to return incomplete employment permit applications to the applicant along with the associated fees and a notification outlining the missing documents to support accuracy and success in applying. DETE intends for these changes to reduce administrative burdens, lower costs for employers and permit holders, and minimise the risk of accidental non-compliance (DETE, 2024a).
- The new legislation further introduced a new type of employment permit, the **Seasonal EP** (DETE, 2024a). Prior to 2024, Ireland did not have a specific permission for seasonally occurring employment. Instead, recruitment for these roles was limited to other permit schemes. This policy change was intended to conform with international standards[49] and provide a targeted, simplified procedure for hiring into recurring, short-term employment forms (DETE, 2024a). Employers wanting to sponsor a Seasonal EP will need to obtain annual pre-approval as an Approved Seasonal Employer ensuring minimum conditions and supports are met.[50] An initial pilot of the Seasonal EP was conducted in the horticulture sector throughout 2025 accompanied by a thorough review process.[51] Due to limited participation in the pilot and significant compliance issues, the scheme could not be adequately tested. A second pilot phase was recommended for the 2027 season, beginning in Q3 2026 (DETE, 2026d). An overview of this pilot and its conditions is offered in Chapter 4.

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49 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

50 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

51 Correspondence with DETE, July 2025.

- The Act also increased flexibility around meeting the conditions of the **Labour Market Needs Test (LMNT) and the 50:50 rule**. The LMNT requires employers to prove that no local (including EEA) workers can be found to meet their labour needs before initiating an application for the General EP, Seasonal EP and Contract for Services employment permit. Previously, this required employers to place a vacancy advert in print media. Following revisions under the Act, the LMNT can now be satisfied by advertising the vacancy on two or more online platforms, one of which must be the EURES employment service site (DETE, 2024a). Similarly, the obligation on employers to demonstrate that at least 50 per cent of their employees are Irish or EEA nationals – also known as the 50:50 rule – can be waived in cases where the permit holder would be the sole employee of a company.[52]
- The **role of employment agencies and subcontractors** was also formally recognised within the employment permit system by the 2024 legislative changes (DETE, 2024a). In principle, any employment permit requires a direct employer-employee relationship. The reformed legislation however now allows for the application of employment permits where the salary of the permit holder is facilitated by an entity other than the employer. In such cases, an employment agency based in Ireland may be considered the employer of the permit holder carrying out the work of a client of that agency. This change is intended to simplify the processing of applications that include both an employer and an employment agency and accommodate contemporary hiring and employment practices (DETE, 2024a).
- The Act also granted the Minister **discretion to specify additional conditions** that must be granted to Seasonal and General EP holders on the grounds of which the permit may be refused (DETE, 2024a). These conditions are intended to protect migrant workers in the workplace and can refer to, for instance, accommodation, training, health insurance, or expenses to be provided to the permit holder under the scheme.
- A last and crucial amendment of the Act are the indexation and increase of the **Minimum Annual Remuneration (MAR) thresholds**. In Ireland, the MAR determines what minimum salary is required in order to sponsor an employment permit. Prior to 2024, there was no

[52] A full discussion and contextualisation of the 50:50 rule and the labour market needs test are offered in Section 4.1.2.

policy in place to routinely review and increase these in line with average wage growth. The Act rectified this by providing for a review of annual indexing of MAR thresholds and subsequent increases where required (DETE, 2024a). Additionally, DETE introduced a MAR Roadmap that provided for a phased approach toward increasing the thresholds over a two-year period. Accordingly, the Roadmap raised the MAR in January 2024 for most roles from €30,000 to €34,000 applying both to newly issued as well as to renewed permits (Government of Ireland, 2024). Certain lower paid roles such as meat processing operative and horticulture worker were only increased to €30,000 (from the previous €22,000) with further increases planned for 2025 (Government of Ireland, 2024). Similarly, increases to the MAR for certain roles in the Health and social care sector[53] was postponed and maintained at €27,000 and raised to €30,000 one year later, in January 2025.[54]

Following this first wave of MAR increases in January 2024, as per the Roadmap, DETE registered a heightened demand for new permits and renewals (Government of Ireland, 2024). Stakeholders from the business community in particular raised concerns about the sustainability and unintended effects of the Roadmap and the Department opted to defer specific subsequent increases planned for 2025 and 2026.[55] The further implementation of the Roadmap was thus halted pending the outcome of a review initiated in December 2024. The review invited evidence, experiences and perspectives from Irish businesses and stakeholders to understand the full impact of the MAR increase and to give sufficient time to incorporate changed employment conditions into business planning (Government of Ireland, 2024).

This review was completed in December 2025 resulting in the publication of a final roadmap (DETE, 2025d). The 2025 Roadmap introduced gradual increases to the MAR thresholds across all permit types. Importantly, the pace at which the increases are implemented will be more gradual than what was initially envisaged by the 2023 Roadmap. According to DETE, this approach reflects feedback received from employers and migrant worker representatives regarding

53 This applies to the role of home carer, care worker, and healthcare assistant.

54 Employment Permits (Amendment) (No. 5) Regulations 2024, SI No. 733/2024.

55 The only exception to the deferrals were employment permits issued for home carers, care workers, and healthcare assistants. The MAR for these roles was increased to €30,000 as planned in January 2025.

the need to ensure fair salaries on the one hand while minimising the risk of unintended consequences such as employers not being able to afford the increase (DETE, 2025d). As of 1 March 2026, the MAR for the General EP was increased from €34,000 to €36,605 and for the Critical Skills EP from €38,000 to €40,904. For the roles of meat processing operative, horticultural worker, healthcare assistant, and home carer the MAR increased from €30,000 to €32,691. Importantly, the 2025 Roadmap also lowered the MAR thresholds for international graduates specifically following feedback received under public consultation. This was done to improve retention of international students into the employment permit system and apply salary thresholds that are reflective of their early career stage. Accordingly, a graduate MAR of €34,009 applies under the General EP where the permit holder graduated from an Irish higher education institution (NFQ level 8 or higher) in the last 12 months. For the Critical Skills EP, a graduate MAR of €36,848 applies where the non-EEA national graduated from *any* higher education institution equivalent to a NFQ level 8 or higher in the last 12 months and applying for a role in Ireland that is relevant to their third-level degree.[56]

The MAR thresholds are a crucial yet contested element of the Irish employment permit system. The way the annual remuneration system is currently set up, MAR thresholds function as the 'de facto minimum wage' for the role and sector in question, according to MRCI.[57] This was criticised, for instance, by NGOs and trade union representatives highlighting that it creates a separate and unequal remuneration system for Irish and non-Irish workers.[58] The increases to the MAR thresholds generally were viewed positively by these stakeholders. Nevertheless, the fragmented nature of the Roadmap's implementation produced challenges for existing employment permit holders. This was because increases only applied to permits issued or renewed after its announcement in January 2024 (or in the case of healthcare assistants after January 2025). For a while, certain migrant workers were thus remunerated differently based on when they received or renewed their employment permit. According to NGOs, this undermined the 'equal pay for equal work' principle.[59] The intention of

56 S.I. No. 643/2025 - Employment Permits (Amendment) (No. 5) Regulations 2025.
57 Interview with MRCI, June 2025.
58 Interview with MRCI, June 2025; Interview with ICI, June 2025; Interview with Unite the Union, July 2025.
59 Interview with MRCI, June 2025.

the Roadmap is to ensure increases to MAR rates are applied from time of grant, with the option open for employers to achieve equivalent rates across the board.

Business and employer representatives, on the other hand, criticised that the increases were too high in many sectors, undermining international competitiveness and overall profit margins.[60] Meeting the thresholds was especially difficult for business outside of Dublin.[61] Employers further criticised that the Roadmap was announced and implemented very suddenly leaving little leeway to incorporate these changes effectively into business planning.[62] The deferral of the 2023 Roadmap was largely a response to these concerns by the Irish business community (Government of Ireland, 2024).

3.2.2 Other labour immigration initiatives

Ireland further supports the attraction and, to a lesser extent, the retention of foreign talent through policy measures that go beyond the exclusive remit of employment permit legislation. Drawing on both national and EU-level instruments, these measures are frequently formulated jointly by DETE and DJHAM.

Labour market access for spouses/de facto partners and for children aged 16-18 years

DJHAM recently amended the rules around labour market access for spouses and partners of employment permit holders. Since May 2024, spouses and de facto partners of most employment permit holders in Ireland receive automatic access to the labour market through registration on the Stamp 1G immigration permission (DJHAM, 2024a). Previously, this group was registered on a Stamp 3 which meant they had to apply for a separate employment permit if they wished to work in Ireland. The Stamp 1G meanwhile was limited to spouses and partners of Critical Skills EP holders and of Researchers on a Hosting Agreement.[63] According to DJHAM, this policy change aims to increase the competitiveness of Ireland in attracting the skills and talent the economy needs, both directly through clearer family reunification

60 Interview with Chambers Ireland, June 2025; Interview with Fragomen, July 2025.
61 Interview with Chambers Ireland, June 2025.
62 Interview with Chambers Ireland, June 2025; Interview with Fragomen, July 2025.
63 Researchers on a Hosting Agreement under DJHAM is not explicitly discussed in this report. It facilitates the employment and residency of non-EEA researchers who have been offered a job at an Irish university, Institute of Technology, or industry/business institution with the appropriate accreditation.

conditions for the original sponsor as well as indirectly by granting immediate labour market access to their partners and spouses (DJHAM, 2024b). The policy change was highlighted as a good practice by many stakeholders consulted for this report.[64]

In 2025, DJHAM applied a similar policy change to the children of employment permit holders aged 16-18 years of age that join a parent in Ireland. Now, these children will be automatically registered on the Stamp 1G (instead of a Stamp 3) granting them similarly unrestricted access to the Irish labour market (DJHAM, 2025).

Single permit scheme for employment and residency permissions

The Irish Government further approved the roll-out of a single application and permit system which would merge the employment and residence permission processes (DJHAM, 2024b). Currently, non-EEA nationals wishing to work in Ireland must first apply for an employment permit with DETE and, if the applicant is visa-required, apply for an immigration permission with DJHAM in a second step. Under a single permit scheme, an applicant would apply to both DETE and DJHAM at the same time and receive a single decision from the Departments. With this policy change, DJHAM intends to reduce the costs and complexity of the current system for both employers and employees (DJHAM, 2024b) and strengthen Ireland's competitiveness in attracting non-EEA talent.[65] Following Government agreement in May 2024, a joint working group between DJHAM and DETE was convened to begin phased implementation of the scheme over three years.[66] The project is currently progressing through a phased development and scoping process, with ongoing cross-departmental engagement to support the design and testing of the proposed model prior to wider implementation.[67] Eventually, this may allow Ireland to opt into the EU Single Permit Directive 2011/98/EU by 2027, subject to further government decision (DJHAM, 2024b). These first steps have been welcomed by stakeholders from both the business and NGO

64 Interview with MRCI, June 2025; Interview with ICI, July 2025; Interview with DJHAM (B), June 2025; Interview with DJHAM (C), June 2025.

65 Minister for Justice (26 September 2024). 'Written response to Parliamentary Question 46 on 'Work Permits'.

66 Correspondence with DJHAM, July 2025.

67 Correspondence with DJHAM, May 2026.

community, as a single permit procedure would significantly reduce the administrative burden on employees and employers.[68]

EU-level instruments

Ireland also engages in EU-level discussions on participation in certain labour mobility instruments including the EU Talent Pool and the related EU talent partnership initiative.[69] The EU Talent Pool is intended to become the first EU-wide platform to facilitate the recruitment of non-EEA labour, matching international jobseekers with EU-wide shortage occupations (European Commission, 2025). While the Talent Pool is not yet operational, a pilot was launched in 2022 in response to the war in Ukraine aimed at facilitating the effective labour market integration of beneficiaries of Temporary Protection. Ireland chose to opt in to the relevant EU Regulation for an EU Talent Pool in 2024.[70] This decision intends to achieve greater strategic alignment with the EU on migration policy and to further support successful talent attraction to Ireland.[71] It is estimated that the EU Talent Pool may begin to be fully operational by 2028 following adoption of the relevant regulation by the EU parliament in March 2026.[72]

Bilateral agreements with countries of origin

Bilateral agreements with countries of origin are an increasingly common labour migration tool supported at EU level through EU Talent Partnerships. These agreements typically focus on recruitment from countries with which the host state shares historical, linguistic, or diasporic ties (EMN, 2025). France, for example, currently has eight such agreements in place (called Concerted Management Agreements) among others, with Senegal and Tunisia, that each include a tailored shortage occupation lists for which the usual requirement to prioritise the hiring of local and EU workers is waived (EMN, 2025). Such approaches are supported, and increasingly institutionalised, through EU Talent Partnerships that aim to strategically engage key partner countries on managing (labour) migration to the EU. While Ireland currently does not participate in

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68 Interview with ICI, June 2025; Interview with Chambers Ireland, June 2025; Interview with DJHAM (C), June 2025.

69 Houses of the Oireachtas (28 February 2024). 'EU Talent Pool: Motion'.

70 Houses of the Oireachtas (28 February 2024). 'EU Talent Pool: Motion'.

71 Houses of the Oireachtas (28 February 2024). 'EU Talent Pool: Motion'.

72 Interview with DJHAM (A), June 2025.

these, DJHAM voiced interest to participate as an observer for one of the relevant partnership countries[73] in the future.[74]

Participation in the Migration Partnership Facility

Ireland has taken initial steps in this direction through its involvement in a pilot project funded under the Migration Partnership Facility (MPF), administered by the International Centre for Migration Policy Development. Mirroring the rationale behind the EU talent partnerships, MPF agreements are private sector driven skills partnerships between selected sending and host countries.[75] Ireland, alongside Germany, is involved in the SUSTAIN pilot, a private sector led project attracting STEM professionals from Nigeria to the EU (ICMPD, 2024). The SUSTAIN project distinguishes itself from other labour migration pathways by offering selected Nigerian workers pre-departure training and orientation, remote onboarding support (including visa assistance) and employer-led mentorship upon arrival (ICMPD, 2024).

According to DJHAM, the project aims to create a win-win dynamic for both the sending and receiving countries: Ireland benefits by attracting critical talent needed for its economy, while Nigeria gains employment and training opportunities for its citizens.[76] DJHAM highlighted several advantages to the pilot. For one, it provides an additional safe and regular migration pathway to Ireland, closely aligned with local skills needs, and as a viable alternative to irregular migration routes.[77] Working with Nigeria specifically also has strategic advantages, given Ireland's existing ties with the country through a shared language and a well-established Nigerian diaspora. Overall, the MPF pilot intends to identify specific challenges and bureaucratic hurdles faced by Irish employers prior to a potential upscaling of the talent partnership model in Ireland.[78]

3.2.3 Safeguards and rights

The Employments Permit Act and Regulations further include specific legislative provisions intended to ensure migrant workers are treated fairly and in line with Irish and EU labour laws (DETE, 2025c). The MAR

[73] EU Talent Partnerships currently exist with Tunisia, Morocco, Egypt, Bangladesh, Pakistan.
[74] Interview with DJHAM (A), June 2025.
[75] Interview with DJHAM (A), June 2025.
[76] Interview with DJHAM (A), June 2025.
[77] Interview with DJHAM (A), June 2025.
[78] Interview with DJHAM (A), June 2025.

thresholds, for instance, are set to ensure migrant workers are paid a fair wage in line with Irish living standards. Since March 2026 (DETE, 2025d), all new employment permits issued are thus remunerated at a minimum of €36,605 annually with the exception of a small number of roles.[79]

Other safeguards similarly aim to minimise the risk of labour exploitation, according to DETE. This includes obligations on employers to produce a written contract of employment and prohibitions on deducting costs related to the employment permit from the worker's salary. Similarly, the new provision allowing the Minister to refuse permit applications where requirements surrounding accommodation, training or expenses are not met, intends to protect migrants in the workplace (DETE, 2024a). Lastly, the new change of employer policy applicable to all Critical Skills and General EP holders after nine months is a key safeguard for migrant workers. Stakeholders interviewed widely viewed it as a good practice that encourages improved terms and conditions and discourages exploitative treatment by employers aware that workers can switch jobs more easily now.[80] Some NGOs nevertheless criticised that the nine-month waiting period for migrant workers on their first permit remains a barrier.[81]

All migrant workers in regular employment are also additionally protected by general Irish labour laws. Employment permit holders receive an electronic copy of their permit which includes a full list of their rights as well as the contact information of the WRC (DETE, 2025c).

The WRC is the Irish state agency responsible for ensuring compliance with any relevant employment legislation. This includes, but is not limited to, the Employment Permits Act. The WRC's mandate is broadly construed in that it offers assistance and information to all legally employed workers in Ireland rather than to migrant workers specifically.[82] In addition to offering free information via their customer

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79 These are the roles meat processing operative, horticultural worker, healthcare assistant, and home carer which are remunerated at a MAR of €32,691 as of March 2026. An exceptionally lower MAR also applies to international graduates that transitioned into the employment permit system as discussed in Section 4.4.

80 Interview with MRCI, June 2025; Interview with Doras, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025; Interview with Fragomen, July 2025; Correspondence with DETE, June 2025.

81 Interview with MRCI, June 2025; Interview with Doras, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025.

82 Interview with the WRC, July 2025.

service and website, the WRC addresses complaints through workplace inspections, unannounced visits, and adjudication.[83]

The Commission may also investigate specific sectors or employers on referral from DETE, although this happens less frequently. In 2024, there were 127 such referrals by DETE's Employment Permits Unit (WRC, 2024).[84] Recent ESRI research on migrants in irregular employment (Stapleton et al., 2024) and the NGOs ICI and MRCI[85] problematised the low number of WRC inspectors as a barrier to effective workplace protections. In January 2024, the number of inspectors operating nationally was 63 (Stapleton et al., 2024), which the WRC intended to increase to 80 in 2025 (WRC, 2024). By the end of 2025, however, 16 inspector vacancies still remain outstanding, according to the WRC (2025). The WRC notes ongoing staff recruitment and retention challenges across the civil and public services sectors and, in cooperation with DETE, works to address this matter.[86]

Despite the WRC's broad mandate, queries relating to employment permits make up a relatively high percentage of their case load. For instance, questions relating to the employment permit system typically account for the largest share of calls to the WRC Infoline at 34 per cent in 2024 (WRC, 2024). Similarly, a relatively high number of convictions arising from WRC Inspection Services enforcement activity related to breaches of employment permit legislation. In 2024, that number was 64 out of a total of 77 convictions, an increase from 2023, mostly occurring in the food services sector (WRC, 2024).[87]

Anecdotally, most breaches of employment permit legislation occur when employers fail to observe MAR thresholds or where permit holders work in roles other than allowed by their permit.[88] Employers found in breach are typically penalised with a fine.[89] Employees, meanwhile, generally receive owed wages recovered by the WRC following an inspection. Additional compensation, on the other hand,

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83 Interview with the WRC, July 2025.

84 Workplace Relations Commission (2024). *Annual Report 2024*. Available at: https://www.workplacerelations.ie/en/publications_forms/corporate_matters/annual_reports_reviews/annual-report-2024.pdf

85 Interview with ICI, July 2025; Interview with MRCI, June 2025.

86 Correspondence with WRC, July 2026.

87 Note that convictions referred to in-text may have been issued in conjunction with other breaches rather than standalone offences under the Employment Permits Act.

88 Interview with Workplace Relations Commission, July 2025.

89 Interview with WRC, July 2025; Interview with MRCI, June 2025.

can only be paid to employees where the case ends in adjudication.[90] Where the original permit is revoked due to an employer's breach, the worker may apply for the Reactivation Employment Permit (see Section 4.2.4 for more information). The Employment Permits Act also grants the Minister the discretion to refuse employers from sponsoring further permits if they have previously breached employment permit law.[91] DETE reports that since 2025, six EP applications were refused on these grounds (one of which was successfully appealed).[92]

Migrant workers, NGOs[93] and trade unions[94] consulted for this research noted that financial penalties are often insufficient to deter employers from breaching their obligations. Stakeholders and prior research (Murphy et al., 2020) additionally problematised widespread gaps in migrant workers' knowledge of their rights and Irish labour laws.[95] According to Doras, migrants are frequently unable to recognise when they find themselves in situations constituting labour exploitation or even trafficking.[96] Similarly, MRCI stressed that many migrants were unaware they could exercise the new right to change employer, despite the policy's clear benefits.[97] This lack of information, combined with weak deterrents for employers, can undermine the effectiveness of existing legal safeguards intended to protect employment permit holders in Irish workplaces.

90 Interview with the WRC, July 2025.
91 Interview with the WRC, July 2025.
92 Correspondence with DETE, July 2026.
93 Interview with MRCI, June 2025; Interview with Doras, June 2025; Interview with ICI, June 2025.
94 Interview with Unite the Union, July 2025.
95 Interview with MRCI, June 2025; Interview with Doras, June 2025. Interview with ICI, June 2025.
96 Interview with Doras, June 2025.
97 Interview with MRCI, June 2025.

Chapter 4

Managing labour immigration through the employment permit system

Ireland's economic migration policy framework is operationalised via the employment permit system. The guiding principles of community preference and labour market needs can be found across a range of eligibility requirements: the Critical Skills Occupations List and the Ineligible Occupations List (Section 4.1.1), a labour market needs test (Section 4.1.2), the 50:50 rule (Section 4.1.3), as well as quota restrictions for certain roles (Section 4.1.4). Chapter 4 also gives a comprehensive overview of the different employment permit (EP) types available to non-EEA nationals differentiating between them in terms of rights and obligations (Section 4.2). Detailed attention is given to the Critical Skills EP, the General EP, the newly introduced Seasonal EP as well as the Reactivation EP. The chapter also briefly discusses the Atypical Working Scheme under the Department of Justice, Home Affairs and Migration (DJHAM) (Section 4.3) as well as policies governing international graduates that newly enter the employment permit system (Section 4.4). Ireland's approach to managing these pathways is compared to those of other EU countries.

4.1 Criteria for granting an employment permit

In Ireland, an existing job vacancy is a necessary but not sufficient condition for the granting of an employment permit. Employers must also meet a range of regulatory requirements intended to minimise disruptions to the local labour market and maintain principles of preferential access for Irish and EEA workers.

4.1.1 Shortage occupation lists

Shortage occupation lists are a policy tool aimed at ensuring that employment permits directly respond to existing labour and skills needs. Lists typically outline any occupation or sector routinely experiencing a shortage in local labour supply and prioritises these for non-EEA recruitment. According to the 2025 EMN Study, ten EMN Member Countries, including Ireland, use such lists to inform their overall labour migration policy (EMN, 2025). Shortage occupation lists are dynamic rather than fixed, as they tend to be periodically updated in line with constantly shifting labour needs. Review intervals can vary significantly, ranging from monthly (e.g. in Austria) to annual (e.g. in

Luxembourg). Typically, highly skilled and highly demanded professions are prioritised, and many countries attach more attractive employment and residency conditions to these roles (EMN, 2025).

EU-wide, Ireland stands out in that it uses not one, but two such occupation lists: a Critical Skills Occupation List (CSOL) on the one hand, and an Ineligible Occupation List (IOL), on the other.

Occupations listed on the CSOL are highly skilled, highly demanded, and in significant shortage of supply in both the Irish and the EEA labour market. According to DETE, filling these occupations is deemed critical for maintaining Ireland's economic growth.[98] The CSOL is reviewed and updated periodically but typically prioritises professions in sectors such as ICT, Finance, and Healthcare as well as higher-skilled occupations across the Construction sector, social science, and academia.[99] Examples include jobs such as architects, medical practitioners, civil engineers, and certain business sales executives. As of May 2026, there are 60 occupations included on the CSOL (DETE, 2026f).[100] For reference, only 43 occupations were included on the list back in 2019.[101] As further explained below, the shortage occupations identified by the SLMRU (discussed in Section 2.2.1) directly inform the CSOL, alongside a range of other evidence. However, the two lists are not identical and serve distinct purposes.

The counterpart to the CSOL is the IOL. It specifies those roles for which there is a sufficient supply of labour from within Ireland and the EEA. Any roles listed on the IOL are thus automatically considered ineligible for an employment permit. Typically, this list includes occupations of a very general skill-set or where a lower level of qualification is required to carry out the work. Current examples of ineligible occupations are travel agents, shopkeepers, florists, and driving instructors. As of May 2026, 184 occupations are included on the IOL.[102]

98 Correspondence with DETE, June 2025.
99 Correspondence with DETE, June 2025.
100 All occupations currently included in the CSOL can be found in Schedule 3 of S.I. No. 213/2026 - Employment Permits (Amendment) Regulations 2026.
101 Schedule 3 of S.I. No. 138/2019 - Employment Permits (Amendment) Regulations 2019.
102 All occupations currently ruled ineligible by the IOL can be found in Schedule 4 of S.I. No. 213/2026 - Employment Permits (Amendment) Regulations 2026.

Reviewing and updating the CSOL and IOL

Both the CSOL and the IOL are reviewed periodically, in practice roughly every two years.[103] This is done to allow the employment permit system to respond flexibly to changing labour market needs by expanding the range of eligible occupations in times of economic growth and narrowing it during times of economic contraction.[104]

Reviews are overseen by the Interdepartmental Group (IDG) on Economic Migration Policy, situated within DETE (2026f).[105] The IDG takes into consideration a range of sources to inform their recommendations on roles to be added or removed from the lists. These include but are not limited to data included in the SLMRU's National Skills Bulletin introduced in Chapter 2. Evidence from the Department of Social Protection on broader labour market activation, as well as information from the Department of Further and Higher Education, Research, Innovation and Science on training and upskilling needs and challenges, further feeds into these reviews.[106] The reviews also include a phase of public consultation gathering evidence-based submissions from representative bodies, government departments, agencies, NGOs and other stakeholders. The public consultation aims to collect data on skills or labour shortages, recruitment efforts and challenges within specific sectors, retention difficulties, and the impact of persisting shortages on sectoral expansion (DETE, 2026f).

When evaluating these submissions and sources, DETE considers certain principles to determine whether an occupation may be included on the CSOL or removed from the IOL (DETE, 2026f). These include whether there are suitable Irish/EEA nationals available to undertake the work; whether granting employment permits for an occupation would undermine development opportunities for Irish/EEA nationals; whether the skills shortage in question is genuine and not a recruitment or retention problem; whether the Government's broader education, training, employment, and economic development policies are supports; and lastly, whether the skills shortage in question exists

103 Correspondence with DETE, May 2026.
104 Correspondence with DETE, June 2025. In the past, this has included the Department of Health, the Department of Transport, as well as the Department of Agriculture, Food and the Marine which hold policy responsibility for sectors currently facing workforce shortages.
105 Interview with SOLAS (A), June 2025.
106 Correspondence with DETE, June 2025.

across the occupation, despite attempts by industry to train and attract Irish/EEA nationals to available jobs (DETE, 2026f).

The most recent of these reviews took place in 2025 with a public consultation running between July and September. The IDG consequently convened to evaluate the available evidence and reach consensus on their recommendations in line with the above principles. In May 2026, the IDG published their report on the review of the two lists, recommending that six roles be added to the CSOL and 11 be removed from the IOL (two of these subject to a quota) (DETE, 2026f). This reflects a recent tendency towards expanding the range of eligible occupations, as both preceding reviews, in 2021 and 2023 respectively, similarly broadened the range rather than narrowing it. In 2023, this resulted in the largest expansion to date, with 11 new roles added to the CSOL and 33 occupations removed from the IOL.[107]

4.1.2 Labour market needs test

Labour Market Needs Tests (LMNT) are a second internationally common tool to ensure that immigration of foreign workers is only facilitated in cases of unmet labour demand (Devitt, 2024). This is generally done to minimise competition for employment opportunities between local and migrant workers, giving priority to the former. Typically, employers are required to advertise a given vacancy in national newspapers or across employment service platforms for a set amount of time before they can initiate the application for an employment permit. The length of local advertising and the platforms set out vary from country to country. LMNTs are generally common across the EMN, with 14 reporting Member Countries implementing a version of it. Some countries, however, have turned away from utilising the LMNT in favour of alternative means of testing the labour market. This was the case in Lithuania, Poland, Portugal and Germany (EMN, 2025).

In Ireland, a LMNT is required for three permit types – the General EP, the Seasonal EP, and the Contract for Services EP – and intends to fulfil obligations under the EU community preference principle (DETE, 2025h).[108] Since passing of the *Employment Permits Act 2024*, the LMNT has been simplified and digitalised (DETE, 2025h). Employers are

[107] S.I. No. 680/2023 - Employment Permits (Amendment) (No.3) Regulations 2023; S.I. No. 286/2021 - Employment Permits (Amendment) Regulations 2021.

[108] The LMNT is required for any General Employment Permit, Seasonal Employment Permit as well as for the Contract for Services Employment Permit.

required to place a vacancy notice with the EU-level EURES employment portal (administered in Ireland by Jobs Ireland) as well as on one or more other applicable online platforms[109] for a minimum of 28 consecutive days. The posted vacancy must include a description of the employment, name of the employer, location and hours of the work advertised, as well as information on Minimum Annual Remuneration. The information contained in the local advertisement must match the international one (DETE, 2025h).

Successful completion of the LMNT entails demonstrating that the vacancy has been advertised within the indicated time-frame and platforms.[110] There is no obligation on employers to demonstrate that no applications have been received, or to hire a suitable local candidate should they apply to the vacancy while the labour market is being tested.[111] DETE argues that recruitment remains first and foremost a business decision in an economic context where the hiring of local workers is usually the faster and more economical hiring option.[112] Where the LMNT has been complied with, employers may apply for an employment permit within 90 days of the commencement of the EURES advertisement.[113]

In principle, all General EP applications must satisfy the LMNT, whereas roles eligible for the Critical Skills EP are exempted.[114] Applications for other permit types may be eligible for an exemption where Enterprise Ireland or IDA Ireland has made a recommendation in respect to one of its client companies. In practice, the majority of General EPs will have satisfied the LMNT, according to DETE.[115]

4.1.3 50:50 rule

A third tool, called the 50:50 rule, requires that at least 50 per cent of any company's employees must be Irish or EEA nationals (DETE, 2025g). Accordingly, no further employment permits are issued or renewed for companies where more than 50 per cent of workers are

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109 The 'online platform' may be any website, software or electronic technology that provides online publication of information, with the principal purpose being to publish offers of employment.

110 Correspondence with DETE, November 2025.

111 Correspondence with DETE, November 2025.

112 Correspondence with DETE, May 2026.

113 Should the employer be a third-level institution, the deadline for making an employment permit application is 120 days from the day in which the notice was first published.

114 Minister of State at the Department of Enterprise, Tourism and Employment (29 July 2025). 'Written response to Parliamentary Question 946 on 'Labour Market'.'

115 Minister of State at the Department of Enterprise, Tourism and Employment (29 July 2025). 'Written response to Parliamentary Question 946 on 'Labour Market'.'

non-EEA nationals. Like the LMNT, this rule aims to satisfy community preference in that it creates a balance between EEA and non-EEA workers (DETE, 2025g). The 50:50 rule applies to small and large corporations alike and concerns all employees regardless of employment conditions working for the Irish entity in Ireland.

The 50:50 rule applies to all roles and permit types including the new seasonal permit that was piloted in 2025. Exemptions are possible where Enterprise Ireland or IDA Ireland has made a recommendation for new companies that have been registered as employers[116] with the Revenue Commission for less than two years. Exemption may also be issued for single-employee companies (i.e. where the employment permit holder would be the sole employee). This aims to support early-stage companies and encourage foreign direct investment, especially in export- and innovation-driven sectors, according to DETE.[117]

In November 2025, DETE initiated an internal review of the 50:50 rule in relation to certain roles in the Healthcare sector.[118] The review was prompted following input from the sector as well as from the Department of Health reporting on recruitment and retention challenges in regard to private sector healthcare assistants.[119] During that process, an interdepartmental agreement was reached to temporarily lift the 50:50 requirement where the *renewal* of employment permits is concerned. This was available to companies in the older person residential care sector.[120] New permits issued in this sector do not benefit from this temporary flexibility. In May 2026, the Government approved a proposal by Minister Burke to begin preparations to amend the *Employment Permits Act 2024* with regard to the 50:50 rule (DETE, 2026g). DETE maintains that such flexibility is required in the case of healthcare assistants, nursing homes, disability care and homecare in order to sustain the State's long-term care capacity and manage Ireland's demographic and fiscal trajectory (DETE, 2026g).

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116 Provided the company is a client of Enterprise Ireland or IDA Ireland and obtained a letter of support by either of these two agencies.

117 Correspondence with DETE, May 2026.

118 Minister of State at the Department of Enterprise, Tourism and Employment (4 November 2025). 'Written response to Parliamentary Question 590 on 'Employment Rights'.'

119 Minister of State at the Department of Enterprise, Tourism and Employment (6 November 2025). 'Written response to Parliamentary Question 226 on 'Work Permits'.'

120 Minister of State at the Department of Enterprise, Tourism and Employment (6 November 2025). 'Written response to Parliamentary Question 226 on 'Work Permits'.'

In contrast to the LMNT and the occupation lists, the 2025 EMN Study found no evidence to suggest that other EU countries operate company-level policies similar to the 50:50 rule (EMN, 2025).

4.1.4 Quotas

A fourth, smaller, feature of Irish economic migration policy is a quota-based limitation for certain roles under the General EP. Immigration quotas are used in labour migration to limit the number of permits issued, typically applied in low-skilled sectors (EMN, n.d.). Across the EMN, 11 Member Countries use some form of quota system, though trends indicate that a decreasing number of occupations is bound by these limitations (EMN, 2025). Quota systems can vary, with some countries such as Ireland tying the immigration cap to occupations, while others link it to nationality, as is the case in Czechia. A less common approach was recently implemented in Lithuania that introduced a fixed annual quota for all foreign workers (regardless of occupation or nationality) relative to its population size (EMN, 2025).

Ireland operates an occupation-based, employer-led quota system that applies to a small number of roles. Following a comprehensive business-led submission from the sector, and in consultation with the Department of Agriculture, Food and the Marine, DETE introduced a first set of quotas in the horticulture, meat-processing and dairy sectors. Table 4.1 gives an overview of the quotas for the years 2018-2025.[121]

[121] Protocol in drafting regulations requires that any new provisions be comprised of the new quota plus those still available, as applicable. Source: Correspondence with DETE, May 2026.

Table 4.1 General Employment Permit quotas, 2018-2025

Role	2018	2019	2020	2021	2022	2023	2024	2025
Home/care worker					1,000		500	1,000
Car mechanic, motor mechanic, auto electrician, motor vehicle technician						200	200	200
HGV/Bus mechanic						200		200
Vehicle body builder and repairer/body shop panel beater						50		50
Sea fisher in the Irish fishing fleet							150	
Meat processing operative	1,500	1,000		1,500	425	1,000	1,000	1,000
Horticulture worker	500			1,000		1,000		
Horticulture Worker (Seasonal Employment Permit)								200
Smiths and forge worker						50		
Moulder, core maker and die caster						50		
Metal plate worker and riveter						50		
Vehicle paint technician						50		
Upholstery and furniture operative						50		
Tailors and dressmakers						50		
Furniture maker and other craft woodworker						50		
Textile process operative						50		
Wood machine operative						50		
Saw doctor						50		
Armature rewinder						50		
Residential day & domiciliary case managers – in disability services						175		
Support worker						175		
Senior care workers – in disability services						175		
Skilled metal, electrical and electronic trades supervisors						175		
Pig managers						250		
Pig farm assistants						250		
Baker						250		

Contd.

Table 4.1 Continued

Role	2018	2019	2020	2021	2022	2023	2024	2025
Forestry worker/speciality forestry harvesting technician						250		
Vehicle roadworthiness tester					100	300		
Dairy farm assistant	50	100		100	500	350		850
Boner (meat) and butcher		300		500		350		
Lineworker						100	250	
Bus and coach drivers					1,500			
Catering & bar manager (and other hospitality roles)				350				
Distribution clerk/assistant		300						
Work rider				100				
Bricklayer/plasterer		500						
Chefs	610							
HGV Drivers		200						

Source: Correspondence with DETE, May 2026.

Quotas have historically been put in place for roles that were removed from the IOL and thus became newly eligible for an EP. This is done to establish the level of demand in the sector, testing by uptake across a sector but also to introduce eligibility in a controlled and measured manner, according to DETE.[122] For instance, simultaneous to the widening of eligible occupations in 2023, DETE imposed quotas for over 20 roles that were previously included on the IOL for a phased transition from ineligible to eligible occupation. This was the case for instance, for the roles of pig farm assistant (DETE, 2025i) as shown in Table 4.1. Further quota extensions of already eligible occupations were implemented in January 2024 which increased, among others, the EP quotas for butcher/boner (DETE, 2025i), meat processing operatives (DETE, 2025i), horticulture workers (DETE, 2025i), home carer/care worker (DETE, 2025i), and for various roles in the auto-mechanics sector.[123] All quotas refer to the maximum number of General EPs that may be granted for a role from the date of introduction.

4.2 Employment permit types

Where an existing job vacancy satisfies the above requirements, a non-EEA national may be sponsored on an EP. There are currently ten

122 Correspondence with DETE, May 2026.
123 Employment Permits (Amendment) (No. 4) Regulations 2024, SI No. 598/2024.

different permit types in place, each of which provides for different employment circumstances and entails a different set of conditions and rights for both employer and employee. The two largest permit categories are the General EP and the Critical Skills EP, together accounting for over 90 per cent of all issuances.[124] In 2024, Ireland additionally introduced a Seasonal EP. Other smaller types include the Intra-Company transfers and Contract for Services EP. Provisions for Researchers on a Hosting Agreement, as well as the Atypical Working Scheme are operated under DJHAM. Between these permit types or schemes, clear differences exist related to access to family reunification as well as to the more flexible immigration status (Stamp 4), Minimum Annual Remuneration, and the ability to transfer to another employer and employment role.

Since April 2025, DETE operates the 'Employment Permits Online' portal for the purpose of receiving and managing employment permit applications and renewals, replacing the previous online application system EPOS (DETE, 2025l). Most actions in relation to employment permits have since been moved to this portal (DETE, 2025l). Employers, employees and agents may use the portal to set up individual accounts and to renew or cancel a permit, receive up-to-date information on the status of a permit application, or to request a change of employer (DETE, 2025j). The creation of an online system was driven by the sharp increase in demand for employment permits since 2022 which also resulted in longer processing times.[125] According to DETE, this move thus intends to make the application process easier, more efficient, more secure, and more customer-friendly (DETE, 2025j).

4.2.1 Critical Skills Employment Permit

The Critical Skills EP is the permit that aims to attract highly skilled migrants into the Irish labour market and encourage their permanent residence in the State (DETE, 2025b). DETE considers eligible occupations under this permit to be critical to the growth of the Irish economy and in short supply in the local labour market (DETE, 2025b). In addition to their attraction, critical workers' long-term retention is an

[124] Correspondence with DETE, July 2025. In 2024, Critical Skills and General EP together accounted for 93.03 per cent of all permits issued that year.

[125] Department of Enterprise, Trade and Employment (23 May 2024). 'Dáil Éireann debate. Ceisteanna ar Sonraíodh Uain Dóibh - Priority Questions'.

additional priority under Ireland's economic migration policy framework (DETE, 2018).

Eligibility and application

Eligibility for the Critical Skills EP is largely determined by inclusion of an occupation on the CSOL (see Section 4.2.1). Additionally, the prospective employee needs to hold a third-level degree that is relevant to the occupation in question (DETE, 2025b). Critical Skills EPs for roles included on the CSOL must be remunerated at a minimum of €40,904 annually (as of 1 March 2026) (DETE, 2025d).[126] Exceptions to the above requirements exist where a particular role is remunerated at a MAR of €68,911 or above. For these highly paid roles, the CSOL and third-level degree requirements are waived, and a Critical Skills EP may be issued based on a sufficiently high salary alone.[127]

No jobs sponsored on the Critical Skills EP require a LMNT, which distinguishes it from the General EP. Employers sponsoring non-EEA nationals must nevertheless ensure compliance with the 50:50 rule and that the respective occupation is deemed eligible by the IOL. Lastly, a Critical Skills EP may only be issued where an employment contract of at least two years is in place. Where a role is included on the CSOL, but an employment contract is shorter in duration, that job may only be sponsored on a General EP (DETE, 2025b).

Residency and employment conditions

Once the permit application has been approved through DETE, the applicant will have to apply for an entry visa with their relevant local Irish embassy or consulate, should they come from a visa-required country. All non-EEA nationals, visa-required or not, will have to additionally register with the Garda National Immigration Bureau upon arrival to Ireland (DETE, 2025b). Upon registration, the permit holder is then issued an IRP card and registered on a Stamp 1 residency. In most cases, the permission and IRP card must be renewed annually.[128]

The employment and residency conditions of the Critical Skills EP are more favourable than those of other permit types.[129] For one, permit holders may apply for family reunification with their spouses/de facto

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126 The MAR for all permit types were amended in December 2025 taking effect on 1 March 2026. Before that date a MAR of €38,000 was in place for the Critical Skills EP.

127 Interview with Fragomen, July 2025.

128 Interview with Fragomen, July 2025.

129 Interview with Fragomen, July 2025; Interview with MRCI, June 2025.

partners and underage children immediately upon arrival to Ireland, without being subjected to a waiting period (DETE, 2025b). Further, Critical Skills workers are granted greater flexibility to change employer. The passing of the *Employment Permits Act 2024* provided both Critical Skills and General EP holders with the option to apply to change employer after nine months; however Critical Skills EP holders may do so within their broader occupational group (called SOC code), rather than only for one specific role (DETE, 2025a). An engineer may, for instance, move from a chemical to a civil engineering role as listed under the SOC-3 code 212 for 'Engineering Professionals' (DETE, 2025a).

As the Critical Skills Employment Permit intends to encourage the retention of critical talent in Ireland, the Government allows permit holders to apply for the Stamp 4 immigration permission after just two years (DETE, 2025b). A Stamp 4 entails largely unrestricted access to the labour market (i.e. without an employment permit), meaning most jobs, sectors and salaries are eligible in conditions more similar to those experienced by EEA workers. Residency under the Stamp 4 is also reckonable for Irish citizenship given other naturalisation requirements can be met (DETE, 2025b).

4.2.2 General Employment Permit

The second main permit type is the General EP. According to DETE, it is the 'primary vehicle ' used by the State to attract third country nationals into shortage occupations as it assumes most occupations and skill levels to be eligible (DETE, 2025g).

Eligibility and application

In principle, all roles are considered eligible for the General EP unless included on the IOL (DETE, 2025g). In contrast to the Critical Skills permit, all General EP roles need to comply with the LMNT to 'test' whether the labour market is experiencing a genuine labour shortage. Additionally, the permit application is also conditional upon satisfying the 50:50 rule, and, for roles where this restriction applies, any quota limitations in place (see Section 4.1.3). A General EP may be initially issued for any period between three and 24 months and renewed for any additional period between six and 36 months. Technically, no minimum period is prescribed under this permit, but any employment lasting less than 90 days would typically be facilitated by DJHAM under

a different immigration permission.[130] The maximum period for which a non-EEA national may thus hold a General EP is a total of five years (DETE, 2025g).

The vast majority of jobs sponsored on the General EP must be remunerated at a minimum of €36,605 (prior to 1 March 2026 this was €34,000) meaning that job categories with wages lower than the MAR are automatically excluded (DETE, 2025d). Exceptions apply to a small number of roles (horticulture worker, meat processor operatives, healthcare assistant and home support worker) for which the MAR is set at €32,691 as of 1 March 2026 (previously remunerated at €30,000) (DETE, 2025g). Prior to this latest increase of MAR thresholds, a small number of healthcare assistant and home carer roles continued to be exceptionally remunerated at salaries below €30,000.[131]

Residency and employment conditions

Upon successful application, the applicant is registered on a Stamp 1 immigration permission.[132] Under the Stamp 1, the General EP holder has permission to work and reside in Ireland on the conditions specified on their permit. The General EP grants access to family reunification, however only following a 12-month waiting period – in contrast to the Critical Skills EP. To be eligible for family reunification with a spouse or de facto partner, the General EP sponsor must demonstrate a minimum annual income of at least €30,000. NGOs and trade unions criticised that in the past this income requirement effectively barred certain permit holders (that received or renewed their permit before the January 2025 MAR increase) from exercising their right to family reunification as they are still remunerated at the lower €27,000 threshold.[133] Since the latest MAR increases, all General EPs issued or renewed after March 2026 meet the €30,000 income threshold needed to exercise the right to family reunification with spouses and de facto partners. Income requirements for reunifying with children are above the €30,000 MAR set for the General EP which MRCI, for instance, criticises.[134]

130 Correspondence with DETE, May 2026.
131 Correspondence with DETE, July 2025.
132 Non-EEA nationals applying for the role of non-consultant hospital doctor only may be registered on a Stamp 1H instead of a Stamp 1 permission.
133 Interview with MRCI, June 2025. Interview with Unite the Union, July 2025.
134 Correspondence with MRCI, May 2026.

Further, General EP holders may also change employer after nine months, however only within the limits of the role specified on their permit (DETE, 2025a). A healthcare assistant, for instance, may only change to another healthcare assistant role, whereas any other different care-related occupation would require a new and separate employment permit application.

Holders of the General EP become eligible to apply for a Stamp 4 permission after five years on their permit (DETE, 2025g).

4.2.3 Seasonal Employment Permit

A new permit type, the Seasonal EP, was introduced under the *Employment Permits Act 2024*. It intends to facilitate the fast recruitment of non-EEA workers into short-term, seasonally occurring employment. (DETE, 2024a).

Eligibility and application

An initial pilot for the Seasonal EP in the horticulture sector was launched in June 2025.[135] Thirty-three such permits were approved during that pilot (DETE, 2026d).[136] The Government passed accompanying secondary legislation (*Regulations*)[137] to specify the precise criteria, application process and eligible employments for granting a Seasonal Employment Permit.

Accordingly, all employers sponsoring a non-EEA worker on this permit are required to obtain annual pre-approval as an Approved Seasonal Employer under the scheme,[138] with six such statuses being granted each year.[139] At the moment, a Seasonal EP may only be issued for the role of 'horticulture operative in the soft fruit or vegetable growing industry'. Corresponding to the permit's rationale, its duration is limited and granted only for a maximum of seven months per calendar year (in the period between 14 April and 13 November).[140]

A permit-specific MAR of €30,000 applies to the Seasonal EP corresponding to an hourly rate of €14.79. Further, a quota restriction

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135 Correspondence with DETE, July 2025.

136 While 33 Seasonal EPs were granted across two Approved Seasonal Employers, only 23 workers ultimately arrived in the State.

137 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.

138 Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'.

139 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.

140 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.

of 200 permits per year is in place. Approved Seasonal Employers sponsoring non-EEA nationals for the Seasonal EP must also comply with the 50:50 rule and conduct an LMNT in advance.[141]

Residency and employment conditions

Compared to the other permit types, the seasonal permit is strictly temporary in nature which has implications for the rights and obligations placed on employers and employees. Approved Seasonal Employers are required to provide adequate health insurance as well as accommodation to the seasonal worker meeting applicable rental accommodation legal standards. Any salary deductions for food or rent are strictly limited in line with the National Minimum Wage Act.[142] Where accommodation is not provided on the site of work, the employer is required to provide transportation.

Seasonal EP holders can avail of the right to change employer as long as the new employer has also obtained Approved Seasonal Employer status with DETE.[143] As is the case for the General EP, the new role must be the same as specified on the original permit.

Due to the temporary nature of immigration, no access to family reunification or long-term residency is provided to seasonal permit holders and no time spent on the permit allows for later transition into the Stamp 4.[144]

Review of the Seasonal Employment Permit

The 2025 pilot was followed by a review of the scheme.[145] For this purpose, DETE convened the advisory group in place to oversee the 2025 Seasonal EP scheme, which included representatives from the Department of Agriculture, Food and the Marine, DJHAM, the Workplace Relations Commission, the Irish Farmers' Association, the Agriculture and Food Development Authority Teagasc, Unite the Union, and MRCI. The report and its recommendations on the future of the scheme were published in May 2026.[146]

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141 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.
142 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.
143 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.
144 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.
145 Correspondence with DETE, July 2025.
146 Correspondence with DETE, July 2025.

DETE concluded that even though the conceptual framework of the permit proved robust, the pilot's implementation revealed several significant vulnerabilities in relation to employer due diligence, recruitment, and compliance (DETE, 2026d). A main issue was the limited uptake of the pilot which made it difficult to adequately test the scheme. Only one employer and 23 workers completed the scheme. While initial interest from employers was higher, only two completed the Approved Seasonal Employer process. Similarly, 33 workers had been issued a Seasonal EP, but eight individuals were unsuccessful in their visa application causing the second Approved Seasonal Employer to drop out of the pilot (DETE, 2026d). Timely arrival also proved difficult as workers only arrived in Ireland in June, despite issuing permits as early as April.

Lastly, the pilot revealed important compliance breaches in regard to accommodation oversight. Accordingly, the sole participating employer relocated their workers to an unknown location without notifying the Department or registering the accommodation with the Rental Tenancy Borad, as required. This made it impossible to conduct inspections due to the unforeseen and unauthorised relocation of the workers.

While data collection for this research predated the pilot, several stakeholders had flagged concerns regarding the Seasonal EP. MRCI[147] and ICI[148] criticised the heightened risk of exploitation associated with the design of the programme. Broader problems with workplace protections, such as a low number of WRC labour inspectors and frequent information and awareness gaps among migrant workers, are likely to also affect the ability of seasonal workers to avail of their rights and protections while on work in Ireland.[149] The short-term nature of the scheme would likely exacerbate this problem, according to NGOs.[150] MRCI and ICI also flagged that, in their experience, exploitation and maltreatment of migrant workers are generally very common in the labour-intensive Agriculture and horticulture sectors, the same sectors to which Seasonal EP holders are being recruited. While a review of the scheme was thus welcomed by these NGOs as a necessary step, they flagged that the limited number of migrant

147 Interview with MRCI, June 2025.
148 Interview with ICI, July 2025.
149 Interview with ICI, July 2025; Interview with MRCI, June 2025.
150 Interview with ICI, July 2025.

workers and employers involved in the pilot was unlikely to produce a genuine picture of risks associated with a full roll-out of the scheme.[151] As of May 2026, DETE recommended a second pilot phase for the 2027 season to test the scheme with stricter controls and earlier roll-out times (DETE, 2026d).

Employer representatives[152] distinctly welcomed the introduction of a Seasonal EP highlighting the added flexibility in meeting time-sensitive demand for labour and skills – a feature previously missing in the permit system. Across the EMN, most countries offer some form of seasonal work permit similar to the Seasonal EP; however in contrast to Ireland, this is mostly under the EU's Seasonal Workers Directive (EMN, 2020a).

4.2.4 Reactivation Employment Permit

A fourth important permit type is the Reactivation EP. It is specifically designed to protect employment permit holders who entered the State via one of the other permits but lost their job through no fault of their own, for instance due to redundancy or workplace exploitation (DETE, 2026c). This permit thus regularises existing migrant workers who fell out of employment and thus no longer hold a valid residence permit (DETE, 2026c).

Eligibility and application

A key eligibility criterion of the Reactivation EP is that the applicant must have held an employment permit and corresponding Stamp 1 at the time of application (DETE, 2026c). Where that employment relationship has ended through no fault of their own or due to workplace exploitation/mistreatment, the worker may be eligible to avail of the Reactivation EP. An initial request is placed with the Immigration and Service Delivery (ISD) within DJHAM asking permission to remain in the State for the purpose of the permit application. If successful, the applicant is issued a *temporary* Stamp 1 and a Reactivation Employment Permit *Letter*. With these documents, the non-EEA national can proceed to secure an offer of employment with an Irish employer during a six-month window. Once an offer is secured, the non-EEA national proceeds with the formal permit application with DETE submitting the ISD-issued Letter, the temporary Stamp 1, and the offer of employment. If successful, the applicant is

151 Interview with MRCI, June 2025.
152 Interview with Chambers Ireland, June 2025.

formally issued a Reactivation EP and registered on a corresponding Stamp 1 permission, and may then legally begin their new employment (DETE, 2026c).

Importantly, working migrants other than employment permit holders (e.g. international students or family members) are not eligible to avail of this scheme (DETE, 2026c). Employment permit holders who became irregular because their initial permit expired and they remained in the State irregularly are also ineligible (DETE, 2026c). Employers hiring on this permit must comply with the 50:50 rule, however quota restrictions and LMNT do not apply.[153] Similarly, some of the standard requirements of other permits are waived under the Reactivation EP, as all occupations are considered eligible (except for domestic work) regardless of inclusion on the CSOL or IOL. A specific MAR also does not apply; however, employers must ensure that the salary complies with the national minimum wage of €14.15 per hour (as of 2026) (DETE, 2026c).

Residency and employment conditions

Like other permit types, the Reactivation EP holder is registered on a Stamp 1 subject to annual renewals. Due to the special nature of this permit, the ordinary change of employer policy does not apply, however the third country national may change place of work after an initial period of nine months. Exceptions can be made where the worker has been made redundant in their new employment or unforeseen changes fundamentally alter the employment relationship (DETE, 2026c). Similar to the General EP, holders of the Reactivation EP may apply for a Stamp 4 after having held the Reactivation EP for five consecutive years. In terms of family reunification, Reactivation EP holders are subject to the same requirements as General EP workers, meaning that a one-year waiting period applies.[154]

NGOs and trade unions consulted in this research flagged the Reactivation scheme as a good practice and important safeguard for employment permit holders in Ireland.[155] MRCI stressed that the scheme offers a practical and legal solution to migrant workers experiencing exploitative or abusive work conditions.[156] Trade unions

153 Correspondence with DETE, May 2026.
154 Correspondence with DJHAM, May 2026.
155 Interview with MRCI, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025.
156 Interview with MRCI, June 2025.

highlighted similar benefits, but also reported on a small number of cases where workers endured a months-long gap between their old permit and the Reactivation EP which left them temporarily without a regular, legal employment option.[157]

4.2.5 Other employment permits

While the above permits are the most important ones for the present analysis due to their scale (General and Critical Skills EP), novelty (Seasonal EP), or safeguarding function (Reactivation EP), Ireland offers six additional immigration pathways through its employment permit system (DETE, 2026e). These are:

- The Intra-Company Transfer Employment Permit/Intra-Company Transfer (Training) Employment Permit (ICTEP);
- The Contract for Services Employment Permit;
- The Internship Employment Permit;
- The Exchange Agreement Employment Permit;
- The Dependent Employment Permit; and
- The Sports and Cultural Employment Permit.

Applicable to a smaller number of cases, these schemes facilitate admission into the State for the purpose of carrying out specific work or time-limited training (DETE, 2026e). For instance, the Intra-Company Transfer Employment Permit provides for the transfer of foreign nationals working as senior management, key personnel or trainees from an overseas branch of a multinational corporation to its Irish branch. According to DETE, this permit can be invaluable in aiding the initial establishment of a foreign direct investment company in the State by allowing for the temporary placement of corporate personnel on a foreign payroll (DETE, 2026b). Other permits are similarly narrow in purpose and scale, as is the case for the Internship Employment Permit facilitating the entry of full-time students studying in a discipline of relevance to occupations listed on the CSOL for the purpose of gathering relevant work experience in Ireland (DETE, 2026e).

The ICTEP Training and Internship EP are not renewable (DETE, 2026e). Permit holders enter the State on the condition that they leave at the end of their contract, internship or exchange agreement unless they secure employment in an eligible occupation, and no option exists to apply for a Stamp 4 later on (DETE, 2026c). In most cases, no LMNT, or

[157] Interview with Unite the Union, July 2025.

quota restrictions apply for these permits, and a broader range of occupations can be eligible in some cases. Nevertheless, all other permit-specific conditions must be met, which at the minimum include time limits and remuneration requirements as specified by DETE (DETE, 2026e).

4.3 Atypical Working Scheme

While most labour immigration is facilitated through DETE and the employment permit system as described above, some cases of temporary, work-related immigration are administered exceptionally through the Atypical Working Scheme (AWS) under DJHAM. The AWS allows for the specialised, highly skilled and short-term employment of non-EEA nationals that cannot be supported through the employment permit system. Certain other employment situations are additionally covered by the AWS (DJHAM, 2026a).

Eligibility and application

Generally, permission under the AWS is only granted for a maximum period of 90 calendar days (exceptions apply), a main distinction to most employment permits (DJHAM, 2026a). The following types of employment may be covered by the AWS:

- Where a skills shortage has been identified;
- Where specialised skills are provided to an industry, business or academic institution for a short period of time;
- Paid internships where the internship is either beneficial or integral to the course being studied in an accredited institution outside the State;
- Short-term employment of locum doctors employed and paid by an agency in the hospital or primary care sector;
- To facilitate clinical adaption and assessment programme or a Royal College of Surgeons Ireland examination (DJHAM, 2026a).

Non-EEA nationals already residing in the State are unable to avail of the AWS. Similarly, an AWS permission may not be granted where other schemes or permits may facilitate admission through DETE. The relevant occupation must also be considered eligible by the IOL (DJHAM, 2026a).

While not operating under the auspices of the employment permit system, all work under the AWS must meet the salary thresholds set

out for the General EP (DJHAM, 2026a). Employers must also meet the requirements of the 50:50 rule. A LMNT, however, is not necessary in respect of the AWS. Applications under this scheme are received and managed through the ISD in DJHAM, not DETE.

Residency and employment conditions

Generally, admission into the State under the AWS is granted for a minimum of 15 and maximum of 90 calendar days (DJHAM, 2026a). Exceptions apply to this limit apply only to doctors providing locum services (up to six months), nurses seeking registration for their foreign qualifications with the Nursing and Midwifery Board of Ireland (up to six months), as well as to paid internships that form an integral part of studies in an accredited institution (up to 12 months). An AWS permission is not reckonable when determining eligibility under the Stamp 4 permission and workers have no right to bring family members to Ireland (DJHAM, 2026a).

Sea fishers under the AWS and the General Employment Permit

Up until 2022, overseas recruitment for the role of 'Sea fisher in the Irish fishing fleet' was administered under the AWS. In 2022, DJHAM decided to close admission under the scheme for this role and, in 2024, DETE subsequently made sea fishers eligible for the General EP following recommendations of a cross-departmental working group (Murphy et al., 2025). The regulation of migrant sea fishers has been subject of ongoing debate in Ireland due to repeated reports of trafficking and exploitation within this sector (Murphy et al., 2025) leading to discussions within the Dáil, Oireachtas Joint Committees, and in Parliamentary Questions.[158]

Unite the Union, a stakeholder consulted in this research, highlighted the high incidence rate of trafficking within the Fisheries sector and welcomed the 2024 decision to move this type of employment to the General EP for better oversight.[159] After the AWS was first closed for sea fishers in 2022, DJHAM opted to regularise many former AWS

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158 See, for instance, Houses of the Oireachtas (20 October 2021). 'Joint Committee on Enterprise, Trade and Employment debate: Resourcing and capacity of the Workplace Relations Commission Discussion'; Houses of the Oireachtas (7 February 2018). Dáil Éireann debate, Wednesday 7 February 2018'; Houses of the Oireachtas (12 October 2022). 'Dáil Éireann debate: Employment Permits Bill 2022: Second Stage (Resumed)'; Houses of the Oireachtas (17 June 2021). 'Dáil Éireann debate: Fisheries and Coastal Communities: Statements'; Houses of the Oireachtas (4 July 2017). 'Joint Committee on Jobs, Enterprise and Innovation debate: Atypical Work Permit Scheme: Discussion'.

159 Interview with Unite the Union, July 2025.

permit holders by granting them the Stamp 4, a decision also welcomed by unions and migrant rights advocates.[160] Nevertheless, the two-year period between close of the AWS scheme (2022) and opening of the General EP for sea fishers (2024) was one of uncertainty as no legal means existed to recruit for this role, according to Unite the Union. The consequence was heightened irregular employment in a sector already characterised by trafficking and exploitation.[161]

4.4 Employment of international students and graduates

Special employment and residency conditions apply to non-EEA students enrolled in degree programmes or language courses across Ireland. Generally, the Government aims to encourage the retention of international talent by offering favourable residency conditions easing graduate's transition into the employment permit system. The 'Global Citizens 2030' strategy aims to further cement Ireland's place as a future destination for international learners, innovators and researchers (DFHERIS, 2024).

Over the course of an international student's stay in Ireland, three different immigration statuses may apply offering different employment conditions each: firstly, during the course of their studies (Stamp 2/2A), secondly during job search following graduation (Stamp 1G), and lastly upon successful transition into the employment permit system (Stamp 1).

Employment conditions as an international student (Stamp 2 and Stamp 2A)

Non-EEA students coming to Ireland to pursue an undergraduate, postgraduate, PhD, or English for Speakers of Other Languages (ESOL) course are mostly registered on a Stamp 2 during their course (up to a maximum of seven years) (DJHAM, 2026b). The Stamp 2 grants students the right to work part-time during school term (up to 20 hours per week) and full-time outside of term time (up to 40 hours). Importantly, no restrictions apply on the type of employment, as labour market access conditions mirror more closely those of Stamp 4 or Stamp 1G holders.[162] A much smaller number of students may be

160 Interview with Unite the Union, July 2025.
161 Interview with Unite the Union, July 2025.
162 Interview with DJHAM (B), June 2025.

registered on a Stamp 2A, primarily in cases where non-EEA nationals are studying in a course not considered eligible by the Interim List of Eligible Programmes.[163] Anecdotally, this applies, for instance, to private secondary school students or to students completing a semester abroad in Ireland.[164] Stamp 2A holders are not allowed to engage in any employment while on their studies in the State (DJHAM, 2026b). No period of time spent on the Stamp 2 or the Stamp 2A is considered reckonable residence for the purpose of making an Irish citizenship application (DJHAM, 2026b).

In 2025, a total of 56,512 Stamp 2 permissions were issued to international students – a significant increase to the 28,750 permissions issued in 2021.[165] Overall, immigration of international students has increased relatively steadily since 2009 (the exception being the years 2020 and 2021 due to restrictions on international mobility during the COVID-19 pandemic).[166] The two dominant nationalities in this cohort are Brazilian (at a total of 15,077 permission in 2025) and Indian (a total of 10,712 permissions).[167] Currently, no government department consistently tracks the employment activity of international students while registered on the Stamp 2. DJHAM explains that Stamp 2 holders are not required to inform the Department of the nature of their work where they engage in casual employment alongside their studies.[168] DETE states that international students' residence permissions and labour market access are the sole policy responsibility of DJHAM as Stamp 2 holders are outside the remit of the employment permit system.[169] Anecdotally, stakeholders report that this group is disproportionately employed in the Hospitality sector.[170] DJHAM reports on clear feedback from employers that

163 Interview with DJHAM (B), June 2025.
164 Interview with DJHAM (B), June 2025.
165 Minister of State at the Department of Justice, Home Affairs and Migration (21 January 2026). 'Written answer to Parliamentary Questions 187, 188, 189 on 'Immigration Policy'.
166 Department of Finance (2025). 'Future forty: Irelands demographic outlook. Trends and Scenarios for the next forty years'. Available at: https://www.gov.ie/en/department-of-finance/publications/future-forty-publications/
167 Minister of State at the Department of Justice, Home Affairs and Migration (21 January 2026). 'Written answer to Parliamentary Questions 187, 188, 189 on 'Immigration Policy'.
168 Minister of State at the Department of Justice, Home Affairs and Migration (5 February 2026). 'Written response to Parliamentary Questions 296, 305, 332, 333 on 'Visa Applications'.
169 Minister of State at the Department of Enterprise, Tourism and Employment (30 September 2025). 'Written response to Parliamentary Question 388 on 'Employment Data'.
170 Interview with DJHAM (B), June 2025; Interview with Fragomen, July 2025.

Stamp 2 holders have a role in addressing labour needs in the Hospitality sector specifically.[171]

Employment conditions following graduation (Stamp 1G)

Following graduation, students can apply to be registered on the Stamp 1G permission.[172] The Stamp 1G is granted for one (in the case of undergraduate courses) or two years (in the case of postgraduate courses) and intends to give students the opportunity to look for work in the State (DJHAM, 2026b). For the duration of the Stamp 1G, no occupational or salary restrictions apply to the permit holder.[173] Importantly however, the stamp functions as a type of 'job search permission' granted temporarily to the graduate to allow them to find a job sponsorable under the employment permit system.

DJHAM reports that HEA data collected on Stamp 1G graduates reveal this cohort mainly goes on to work in the HSE as well as in ICT and Education sectors.[174] Doras, an NGO helping international students transitioning into the employment permit system, reports that timing can be an issue where graduates do not manage to find sponsorable employment before expiration of the Stamp 1G.[175] Doras nevertheless states that the process works well in most cases and welcomes DJHAM's flexibility in occasionally granting a 2–3-month-long extension where a graduate found employment and is in the process of obtaining an employment permit but requires some extra time.[176]

Employment conditions following transition into the employment permit system (Stamp 1)

Where a graduate successfully found an employer willing to sponsor them on an employment permit, they will be registered on a Stamp 1 permission like other employment permit holders.[177] Importantly, in order to be eligible for either the Critical Skills or General EP, all applicable restrictions including LMNT, CSOL/IOL, 50:50 rule, MAR thresholds and quotas must be respected. These restrictions are to be contrasted with the occupational flexibility enjoyed under the Stamp 2

171 Interview with DJHAM (B), June 2025; Interview with DJHAM (C), June 2025.
172 Interview with DJHAM (B), June 2025.
173 Interview with DJHAM (B), June 2025.
174 Interview with DJHAM (B), June 2025.
175 Interview with Doras, June 2025.
176 Interview with Doras, June 2025.
177 Interview with DJHAM (B), June 2025.

and Stamp 1G.[178] During data collection for this report in May-July 2025, several stakeholders reported challenges where high MAR thresholds impeded the retention of international students into the employment permit system.[179] Fragomen explained that in the context of the Critical Skills EP especially, the (then) €38,000-high MAR was out of touch with standard entry-level salaries for graduates entering the job market.[180] Retention was particularly difficult where employers were able to hire a graduate at lower costs while still on the Stamp 1G, but had to pay a significantly higher salary in order to retain them on an employment permit.[181]

Importantly, as of March 2026 and following stakeholder input collected during public consultation, DETE opted to lower the MAR thresholds for graduates.[182] Accordingly, an adjusted graduate MAR of €34,009 now applies for the General EP (instead of €36,605) where the permit holder graduated from an Irish higher education institution (NFQ level 8 or higher) in the last 12 months. For the Critical Skills EP, a graduate MAR of €36,848 applies (instead of €40,904) where the non-EEA national graduated from any higher education institution (in or outside of Ireland) equivalent to a NFQ level 8 or higher in the last 12 months and is applying for a role that is relevant to their third-level degree.[183]

Stakeholders interviewed for this research highlighted employers' strong interest in retaining international students.[184] Fragomen for instance explained that there is little to no associated relocation costs for employers as graduates are already familiar with the language and work culture, and are likely better equipped at navigating the Irish rental market.[185] DETE also highlights international students' importance to the employment permit system, reporting that international graduates consistently make up about 20-25 per cent of all Critical Skills EP applications each year (DETE, 2025d). Research conducted by the Department of Finance (2025b) further highlights that the importance of international students to the labour market has

178 Interview with DJHAM (B), June 2025.
179 Interview with DJHAM (B), June 2025; Interview with Doras, June 2025; Interview with Fragomen, July 2025.
180 Interview with Fragomen, July 2025.
181 Interview with Fragomen, July 2025.
182 S.I. No. 643/2025 - Employment Permits (Amendment) (No. 5) Regulations 2025.
183 S.I. No. 643/2025 - Employment Permits (Amendment) (No. 5) Regulations 2025.
184 Interview with Fragomen, July 2025; Interview with DJHAM (B), June 2025.
185 Interview with Fragomen, July 2025.

grown over time: in 2016 just 12 per cent of employment permits (both Critical Skills and General EP) had been issued to foreign graduates. By 2024, that number had increased to 28 per cent.

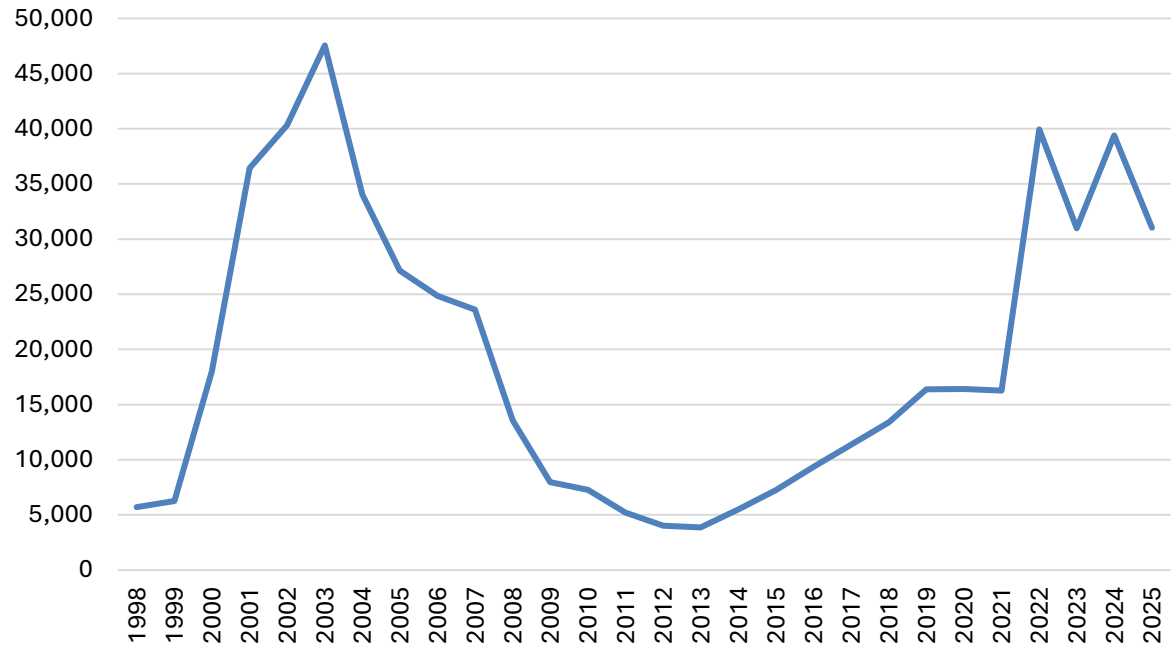
Chapter 5
Employment permit data

This chapter analyses data on the use and distribution of employment permits (EPs) in Ireland. Information is drawn from several sources including publicly available statistics published annually by the Department of Enterprise, Tourism and Employment (DETE), data obtained from DETE and the Department of Justice, Home Affairs and Migration (DJHAM) upon request, as well as from secondary sources such as the National Skills Bulletin (NSB) and demographic forecasting by the Department of Finance. On that basis, we analyse and contextualise the recent upsurge in employment permit usage (5.1). The chapter further discusses EP data disaggregated by permit type (5.2), country of origin (5.3), economic sector (5.4), occupational grouping (5.5), as well as by company sponsor (5.6). A last section synthesises Department of Finance data on the retention rates of employment permit holders.

5.1 Overview

Overall use of the employment permit system has fluctuated greatly in the past two decades. Within the time period considered for this research (2021-2025 inclusive), the number of employment permits issued and renewed more than doubled within the scope of a single year. While in 2021 just 16,275 employment permits were issued, that number reached 39,955 by 2022 – an increase of 145.5 per cent. Nonetheless, figures remain below the record number observed in 2003 (47,551), a time when economic growth was exceptionally high and restrictions such as the labour market needs test and the Ineligible Occupations List – core features of Ireland's employment permit system today – were not yet in place.

Figure 5.1 Total employment permits issued (including renewals), 1998-2025



Source: DETE (2025e) and Joyce (2012).

The post-2021 surge in employment permit usage can be understood through a combination of factors. For one, we can contextualise the increase within broader labour market dynamics. As discussed in earlier chapters, the Irish labour market currently experiences near full employment, with high employment and labour force participation rates and relatively low unemployment (McNaboe et al., 2025a). Simultaneously, employment is growing rapidly, meaning that there are more jobs overall in Ireland than there were previously (Department of Finance, 2025a), and shortage occupations affect strategically important sectors across Healthcare, Construction, Technology and Transport, among others. Yet, the Irish vacancy rate is moderate in comparison to the EU average, remaining relatively stable in recent years. This suggests that the surge in permits visible in Figure 5.1 cannot be attributed to labour-market tightness alone but also reflects broader policy changes as well as demographic and migratory developments that have strengthened Irish employers' reliance on non-EEA labour.

DETE's decision to significantly expand the range of eligible occupations was likely a driving factor.[186] In response to sustained labour demand in specific sectors, the Department removed a range of roles from the Ineligible Occupations List in 2021 and in 2023, thus

[186] Correspondence with DETE, June 2025.

making them newly eligible for non-EEA recruitment. This benefitted in particular the Construction and Healthcare sectors.[187] For instance, the role of healthcare assistant only became eligible for non-EEA recruitment in 2021,[188] but accounted for 3,021 employment permits in 2025 alone.[189]

The largest expansion to date occurred in 2023 when a total of 33 new roles were introduced to the employment permit system.[190] These included, for instance, social care workers, electricians, mechanics and technicians.[191] Notably, it is particularly lower skilled occupations that were impacted by the expansion, sponsorable under the General EP. Eleven roles were also added to the Critical Skills Occupations List allowing for recruitment under the Critical Skills EP specifically.[192] This expansion allowed employers to hire non-EEA workers across a broader range of work than was possible before 2021.

While overall EP issuances are thus very high, Figure 5.1 shows two dips in 2023 and 2025. Available evidence suggests that these stem from regulatory changes and administrative backlog rather than from an actual decrease in labour demand. For one, DETE removed the need to apply for a (new) employment permit in several instances. Under the *Employment Permits Act 2024*, migrant workers must no longer apply for a new permit in cases of internal transfer, promotion or where they change employer after nine months on their initial EP. DETE reports that 2,500 such change-of-employer requests were approved in 2025 (thus not accounted for in Figure 5.1).[193]

Similarly, both spouses/de facto partners (as of 2024) as well as children aged 16-18 years of age (as of 2025) accompanying employment permit holders to Ireland need no longer apply for an EP where they wish to work in Ireland. This changed due to the government decision to register family members on a Stamp 1G permission which grants automatic access to the labour market (DJHAM, 2024a). DETE further notes that more permit applications were received in 2023 than in 2022 (38,469 compared to 35,606).

187 S.I. No. 286/2021 - Employment Permits (Amendment) Regulations 2021.
188 S.I. No. 286/2021 - Employment Permits (Amendment) Regulations 2021.
189 Minister for Enterprise, Tourism and Employment (27 January 2026). 'Written response to Parliamentary Questions 430, 431, 432, 433 on 'Work Permits'.'
190 Correspondence with DETE, June 2025.
191 S.I. No. 680/2023 - Employment Permits (Amendment) (No.3) Regulations 2023.
192 S.I. No. 680/2023 - Employment Permits (Amendment) (No.3) Regulations 2023.
193 Correspondence with DETE, May 2026.

However, due to a substantial processing backlog arising from the high volume of applications submitted in 2021, many permit decisions were only issued in the subsequent year, affecting annual permit output.[194]

Lastly, changed demographic and migratory patterns likely played a role in the increase of non-EEA labour migrants. As was discussed in Chapter 1, intra-EU migration played a significant role in meeting demand for labour during Ireland's economic boom, especially in the period following 2004 EU enlargement (Ruhs, 2005). Back in 2007, 97,100 out of a total of 134,000 new immigrants came to Ireland from other EU countries (predominantly from the New Member States) (CSO, 2025a). This number shrank significantly throughout Ireland's economic recession and did not recover with the return to economic growth. In 2025, the number of EU nationals reached only 25,300 out of a total of 125,300 immigrants that year. In contrast, 63,600 immigrants were attributed to the 'Rest of World' category that year, which includes (but is not limited to) immigration under the employment permit system (CSO, 2025a).

Further, the labour market is coping with the emigration of working age residents which impacts the size of the labour force. Between 2020 and 2024, the number of Irish and non-Irish emigrants increased by 37 per cent, many of which were aged 15-44 years (Creaton et al., 2025). About half of emigrants tend to be Irish citizens, according to the CSO (2025a). Nevertheless, some of this migration is circular: in 2025, for instance, a roughly equal number of Irish citizens left the State (35,000) as returned to Ireland (31,500) (CSO, 2025a).

5.2 Employment permits issued by permit type

The volume of permit issuance greatly varies across permit types. The majority of non-EEA workers recruited through the employment permit system are sponsored on either the General EP or the Critical Skills EP. In the available data period (2015-2024 inclusive), both permits collectively accounted for at least 77 per cent of all permits issued, increasing their share annually since 2015. In 2024, 93 per cent of all permits were attributed to either the Critical Skills EP or the General EP. Figure 5.2 illustrates the absolute and relative shares of all permit categories over the past decade. Notably, before 2014, most such occupations were grouped under either the 'work permit' category or

194 Correspondence with DETE, May 2026.

'green card', meaning no disaggregated data for the Critical Skills and General EP are available for earlier years.[195]

Among the two dominant permit categories, we see some fluctuation in their relative shares. Between 2017 and 2023, DETE consistently issued more Critical Skills EPs annually than General ones, accounting for 43.8-57.9 per cent of all permits. This changed however in 2024. For the first time since 2016, more General EPs were issued at a total of 19,478 (a share of 49.4 per cent). That same year only 17,168 Critical Skills EPs were granted (43.6 per cent).

Two conditions possibly explain this change. Firstly, most of the occupations that were newly made eligible in 2021 and 2023 are lower skilled roles.[196] In official employment permit data, this expansion thus appears through an increased number of General EPs issued in the years to follow – an upward trend that is likely to continue. Secondly, this dataset considers both newly issued and renewed permits, however only the General EP is renewable. Critical Skills EP holders, in contrast, directly transition into the Stamp 4 system after two years, and thus are captured in employment permit statistics for a shorter period. Recent research by the Department of Finance (2025b) further reveals that 40 per cent of newly recruited Critical Skills EP holders in fact leave the State after two years.[197] Generally however, there are no official data that account for the shares of employment permit holders that transition into the Stamp 4 after two (Critical Skills) or five years (General).[198]

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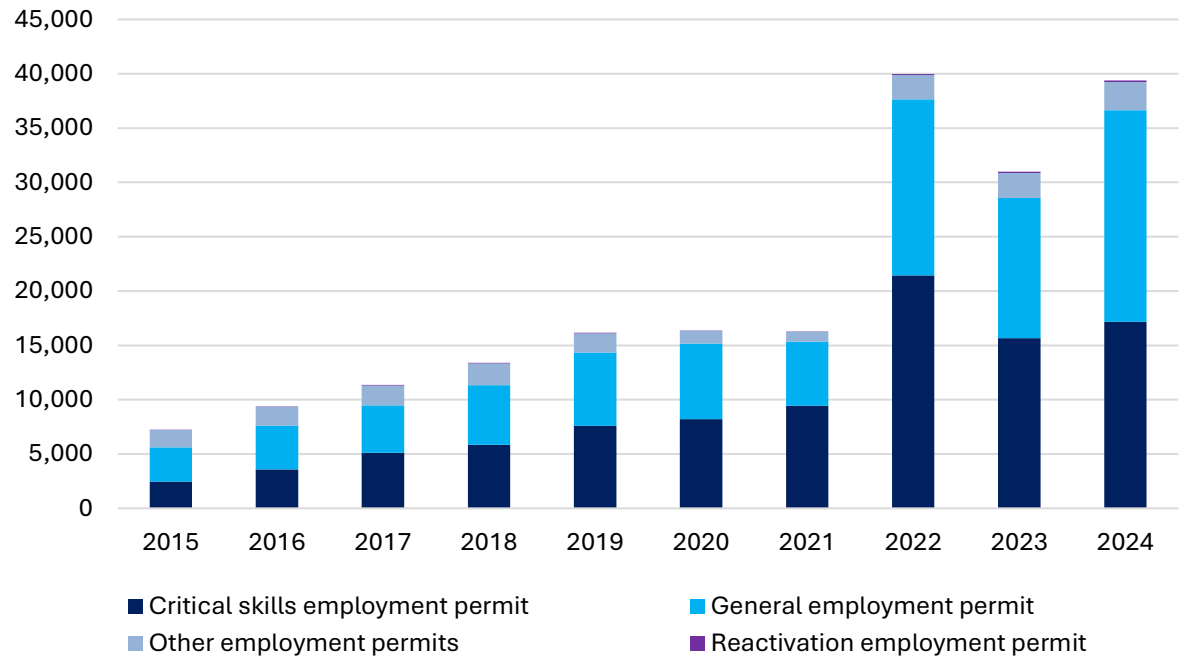
195 The work permit and green card are broadly analogous with the General EP and the Critical Skills EP. Source: Correspondence with DETE, May 2026.

196 S.I. No. 680/2023 - Employment Permits (Amendment) (No.3) Regulations 2023.

197 Please note that the Department of Finance research report distinguishes between Critical Skills EP holders that were previously not resident in Ireland ('CSEP Not Resident') and those Critical Skills EP holders that were previously registered in Ireland on a Stamp 2 student permission ('CSEP Student'). The 40 per cent number cited above refers to the Not Resident group only.

198 Correspondence with DJHAM Immigration Service Delivery, January 2026.

Figure 5.2 Employment permits issued by permit type, 2015-2024



Source: Correspondence with DETE, June 2025.

In 2024, DETE also issued a record number of Reactivation EPs at 170. In absolute terms, this is the highest number recorded in the available data period (2015-2024). In relative terms, Reactivation EP issuances accounted for just 0.43 per cent of all permits in 2024. While this is almost three times the share recorded in 2021 (0.14 per cent), it is still below the 0.62 per cent recorded in 2015. While thus a very small proportion of permits overall, an increased use of Reactivation EPs may indicate higher incidences of workplace exploitation or redundancy. The precise reasons for issuing a Reactivation EP in each instance are not publicly available [199]

Due to small size, all six remaining permit categories (those listed in Section 4.2.5) have been clustered together in the 'Other employment permits' category. A decade ago, the relative importance of these permits appeared higher as they accounted for 21 per cent of all permits issued and renewed in 2015 (1,583 total). Since then, their share has decreased quite consistently, amounting to just 6 per cent in 2024, a total of 2,582 permits.

The new Seasonal EP is not included in Figure 5.2 as it was piloted only in 2025. DETE reports that 23 seasonal workers were successfully

[199] Correspondence with DETE, June 2025.

recruited that year, with higher participation planned for the second phase of the pilot set to begin in 2026 (DETE, 2026d). Upon full roll-out of the scheme, up to 200 Seasonal EPs may be issued annually as per the *Seasonal Employment Regulations 2025*.[200]

Similarly, the Atypical Working Scheme is not captured in employment permit data as it operates under DJHAM, not DETE (DJHAM, 2026a). In 2024, a total of 6,330 Atypical Working Scheme permits were granted, the vast majority for nurses.[201] Interestingly, this number decreased significantly in 2025, as the total number of permissions amounted to just 2,428 permits.[202]

5.3 Employment permits issued by nationality

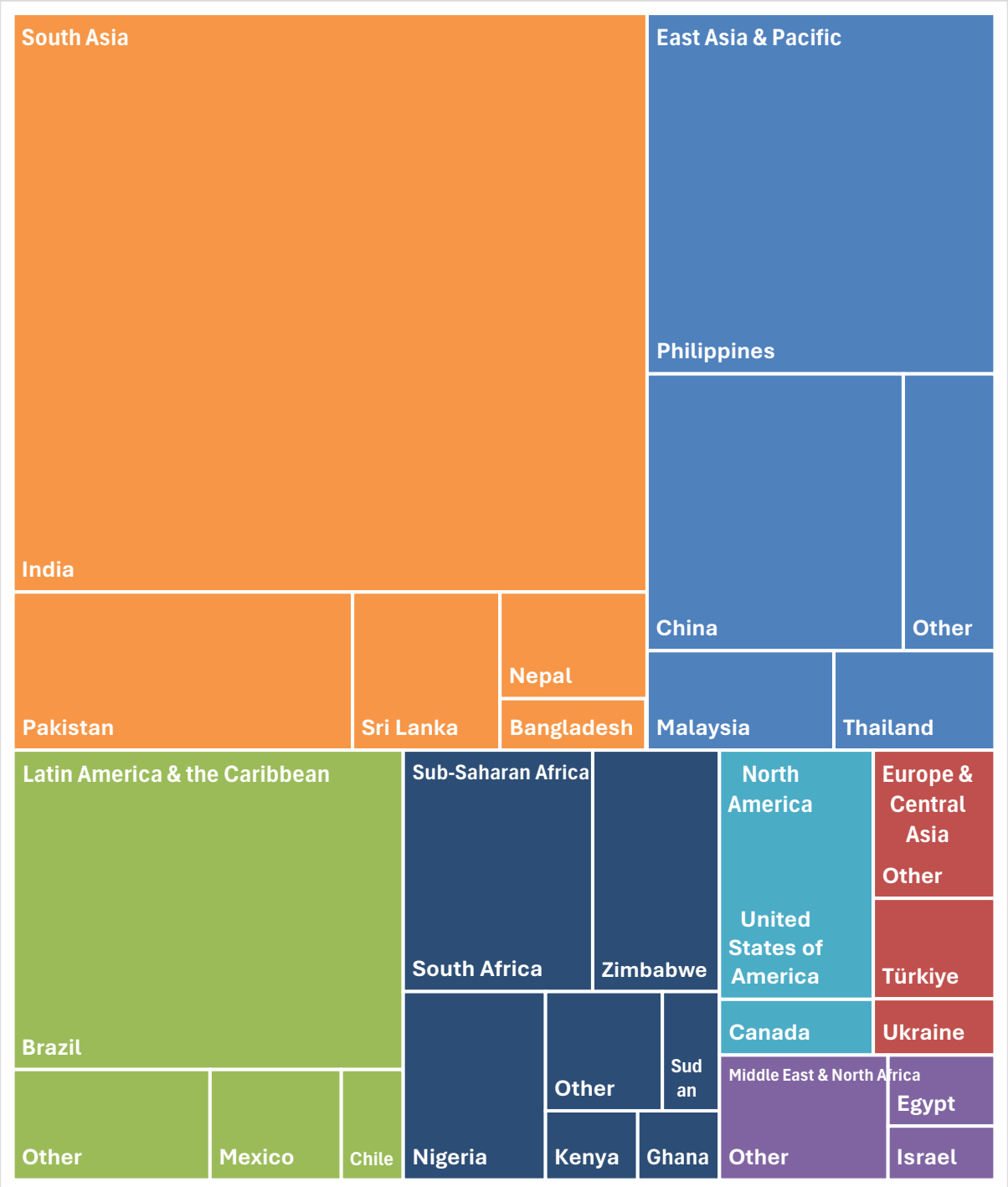
Many nationalities – 137 in total – were represented among the cohort of employment permit holders in 2025 (DETE, 2026a). Figure 5.3 shows the countries of origin (according to nationality) of non-EEA nationals sponsored on an employment permit in 2025 clustered according to region (DETE, 2026a). Countries of origin with low employment permit numbers are accounted for in the 'Other' category.

By far the largest share is accounted for by Indian nationals at 32 per cent of all permits issued in 2025, a total of 9,947. Overall, 40.8 per cent of all permits were issued to nationals from South Asia. The second and third largest countries of origin are the Philippines accounting for 11 per cent (3,398 permits), closely followed by Brazil at 11 per cent (3,381 permits). Fourth and fifth largest countries of origin are China at 6.2 per cent and Pakistan at 4.7 per cent.

These trends are largely consistent with previous years, as Indian has been the dominant nationality among employment permit holders since 2021. Similarly, the Philippines and Brazil have consistently made the top five countries of origin, though with some fluctuations in their absolute numbers (Murphy and Sheridan, 2022; 2023; Murphy et al., 2025; Potter et al., 2025).

200 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.
201 Correspondence with DJHAM, October 2025.
202 Correspondence with DJHAM, March 2026.

Figure 5.3 Countries of origin for those issued employment permits in 2025



Source: DETE (2026a).

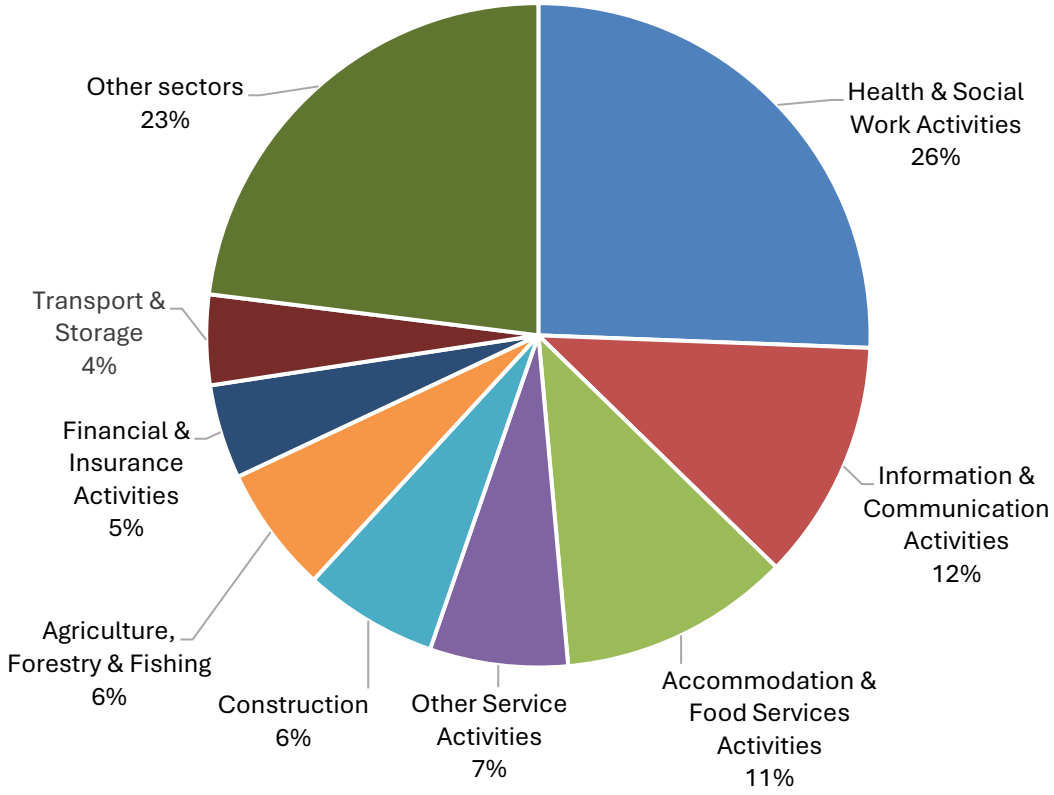
5.4 Employment permits issued by economic sector

Figure 5.4 shows the sectors for which employment permits were issued in 2025. Health and social work distinctly emerges as the largest sector having sponsored a quarter of all employment permits issued and renewed that year (26 per cent). This sector is followed by Information and communication activities at 12 per cent and

Accommodation and food services at 11 per cent. Other notable sectors are Agriculture, forestry, and fishing (6 per cent), Construction (6 per cent) as well as Financial and insurance activities (5 per cent) (DETE, 2026a). Compared to previous years, a more diverse range of sectors is represented in the employment permit system with higher sponsorship numbers: in 2021 for instance, Health and social work and Information and communication activities collectively accounted for the vast majority of all permits at 64 per cent. In 2025, their collective share was just 38 per cent (DETE, 2026a).

While not included in overall employment permit statistics, the AWS also makes an important contribution to the Health sector. In 2025, 63 per cent of a total of 2,428 AWS permits were issued for the role of nurse.[203]

Figure 5.4 Sectors in which employment permits were issued or renewed in 2025



Source: DETE (2026a).

Over the course of the research period, almost all sectors recorded an uptick in employment permit usage. The only exception is the Information and communication activities sector that saw a 21 per

[203] Correspondence with DJHAM, March 2026.

cent decrease in employment permits compared to 2021. Table 5.1 shows the absolute number of permits issued per sector as well as the percentage change between 2021 and 2025. The largest percentage changes occurred for sectors with overall very low sponsorship numbers such as Mining and quarrying (from two permits in 2021 to 98 permits in 2025), Public administration and defence (from four to 54 permits), Professional, scientific and technical activities (from 85 to 765 permits), as well as in the Water supply and sewage waste management sector (from 12 to 86 permits).

Sectors with higher sponsorship rates similarly recorded large increases, such as Transport and storage (from 265 to 1,363 permits), Other manufacturing roles (from 248 to 1,292 permits), Accommodation and food services activities (from 786 to 3,499 permits), and Construction (from 607 to 2,031 permits).

The overall largest sector in the employment permit system, Health and social work recorded a relatively small increase at 37 per cent, however still accounting for a significant portion of employment permits overall at 7,948 permits. The smallest increase was recorded for Financial and insurance activities reaching 1,424 permits in 2025 (a 30 per cent increase). Only the Information and communication activities sector experienced a negative percentage change at -21 per cent, despite being the second biggest sponsor in the employment permit system overall. Notably, this sector did experience a permit increase of 47 per cent in the previous year (DETE, 2026a).

Table 5.1 Percentage change per economic sector, 2021 and 2025

Economic sector	2021	2025	% change
A - Agriculture, Forestry & Fishing	888	1,915	**116%**
B - Mining & Quarrying	2	98	**4,800%**
C - All Other Manufacturing	248	1,292	**421%**
C - Manufacture of Chemicals & Pharmaceuticals	274	600	**119%**
C - Manufacture of Computers, Electronics & Optical Equipment	72	431	**499%**
C - Manufacture of Food, Drink & Tobacco	111	496	**347%**
C - Manufacture of Medical Devices	93	286	**208%**
D - Electricity & Gas & Air Conditioning Supply	86	342	**298%**
E - Water Supply - Sewerage Waste Management & Rem	12	86	**617%**
F - Construction	607	2,031	**235%**

Contd.

Table 5.1 Continued

Economic sector	2021	2025	% change
G - Wholesale & Retail Trade	120	622	**418%**
H - Transport & Storage	265	1,363	**414%**
I - Accommodation & Food Services activities	786	3,499	**345%**
J - Information & Communication Activities	4,615	3,630	**-21%**
K - Financial & insurance Activities	1,094	1,424	**30%**
L - Real Estate Activities	7	40	**471%**
M - All other Professional, Scientific & Technical	151	690	**357%**
M - Professional, Scientific & Technical Activities	85	765	**800%**
N - Administrative & Support Service Activities	21	94	**348%**
O - Public Administration & Defence	4	54	**1250%**
P - Education	91	464	**410%**
Q - Health & Social Work Activities	5,793	7,948	**37%**
R - Arts, Entertainment and Recreation	252	593	**135%**
S - Other Service activities	595	2,087	**251%**
T - Domestic- Activities of Households as Employer	3	8	**167%**
Sector not specified	N/A	186	**N/A**
Total	16,275	39,390	**142%**

Source: DETE (2022) and DETE (2026a).

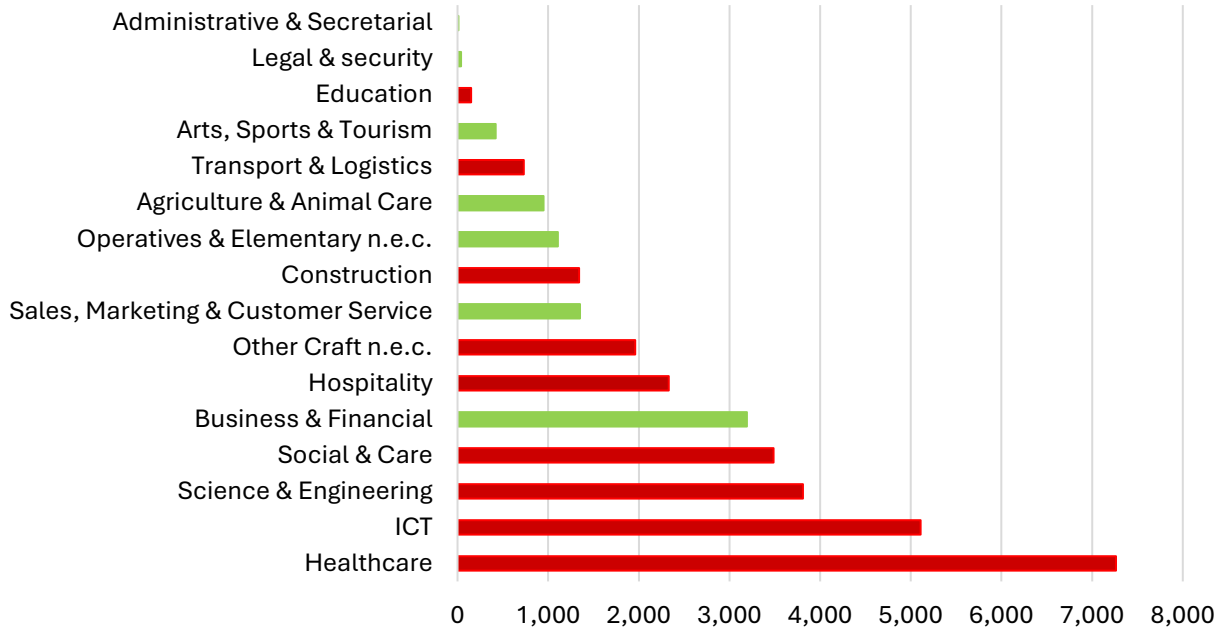
Lastly, there is visible sector-wide preference to recruit either through the Critical Skills EP or the General EP (Department of Finance, 2025b). Accordingly, Critical Skills EP holders dominate among employment permit holders across the Information and communication sectors, Financial and insurance, as well as in Manufacturing, energy supply and water supply (C-E). General EP holders, in contrast, are best represented across Health and social work activities as well as in Accommodation and food services (Department of Finance, 2025b).

5.5 Employment permits issued by occupational group

Figure 5.5 shows the number of permits issued per occupational group using the SLMRU's classifications introduced in Chapter 2. Complementing the sectoral analysis above, it allows us to contextualise employment permit issuances within existing labour and skills shortages. The colour codes indicate whether the SLMRU has identified shortage occupations within a particular occupational group (red indicating a shortage, green indicating no shortage). As the SLMRU does not quantify these, it is not possible to comment on the severity

of each shortage and how it corresponds to employment permit issuance (McNaboe et al., 2025a). Similarly, the data are generally unable to match employment permits to the specific roles that have been identified to be in shortage (e.g. the role of 'healthcare assistant' within the 'Social & care occupations'). Lastly, the SLMRU data on occupational groups considers only newly issued permits, not renewals. Accordingly, the total considered in this section (33,248 permits) is lower than in DETE's public statistics (39,390). As the analysis relies on data from the latest available National Skills Bulletin, it references the year 2024 not 2025.

Figure 5.5 New employment permits issued per occupational group in 2024



Source: McNaboe et al. (2025a).

Note: Each bar shows the number of employment permits newly issued in 2024 for that occupational group. The colour codes indicate whether the Skills and Labour Market Research Unit identified a labour or skills shortage. Red is used if at least one shortage was attributed to that occupational grouping, while green indicates no shortage was found.

The figure shows that overall permit usage is indeed strongest within those occupational groupings experiencing shortages. Accordingly, the healthcare, ICT, science and engineering, as well as the social and care occupations account for the largest shares of newly issued EPs in 2024. Significant shares were also recorded for the hospitality and craft occupations that were reportedly affected by skills shortages in 2024 (McNaboe et al., 2025a).

Notably, the business and financial occupations stand out as they account for the fifth largest share of EPs (at 3,192 permits) but remain

unaffected by shortages according to the SLMRU. Two factors might explain this variation. For one, the business and financial occupations account for one of the largest shares of the workforce overall at 11 per cent (McNaboe et al., 2025a). In contrast, most other occupational groups listed above, such as healthcare and ICT, each only account for between 5-6 per cent of the workforce. Thus, business and financial occupations make comparatively limited use of employment permits given their large share of the workforce overall. Second, in certain cases companies may sponsor non-EEA nationals on the Critical Skills EP even where no explicit labour or skills shortage was identified. Where an employer pays a MAR of €68,911 or above, the CSOL and LMNT requirements can be waived (see Section 4.3.1). Accordingly, a verified skills shortage is not a strict prerequisite for access to the employment permit system where an employer is willing to pay a sufficiently high salary. This matches DETE's employment permit data which, for instance, indicate that 1,979 out of 2,318 EPs issued for the financial and insurance activities were Critical Skills (DETE, 2026a).

The education-related occupations similarly stand out. While affected by a skills shortage for subject-specific secondary teachers, they only make up a very small share of newly issued permits (150 total) and are the third smallest group overall in Figure 5.5. Yet, at 7 per cent, this grouping accounts for a sizable share of employment in Ireland (McNaboe et al., 2026a). One possible explanation might be that foreign skills and qualifications for regulated education-related professions do not translate well. In fact, vacancy data on these occupations reveal that English and Irish (alongside PE and maths) were the most common subjects in shortage, for which foreign qualifications might be less suitable (McNaboe et al., 2026a). In light of this, alternative means to address skills shortages in the Education sectors – such as adjusting wages, investing in up- or re-skilling or labour market activation policies – may be of greater relevance to these roles.

Finally, what stands out in the context of the SLMRU's analysis is the relationship between labour/skills shortages on the one hand and between the relative shares of Critical Skills/General EPs on the other. This is because the 2025 National Skills Bulletin only identified a single labour shortage for the role of care worker, while all 19 remaining instances were skills shortages (McNaboe et al., 2026a). While one might expect labour shortages to correspond to General EPs and skills shortages to Critical Skills EPs, the available data rather reveal that

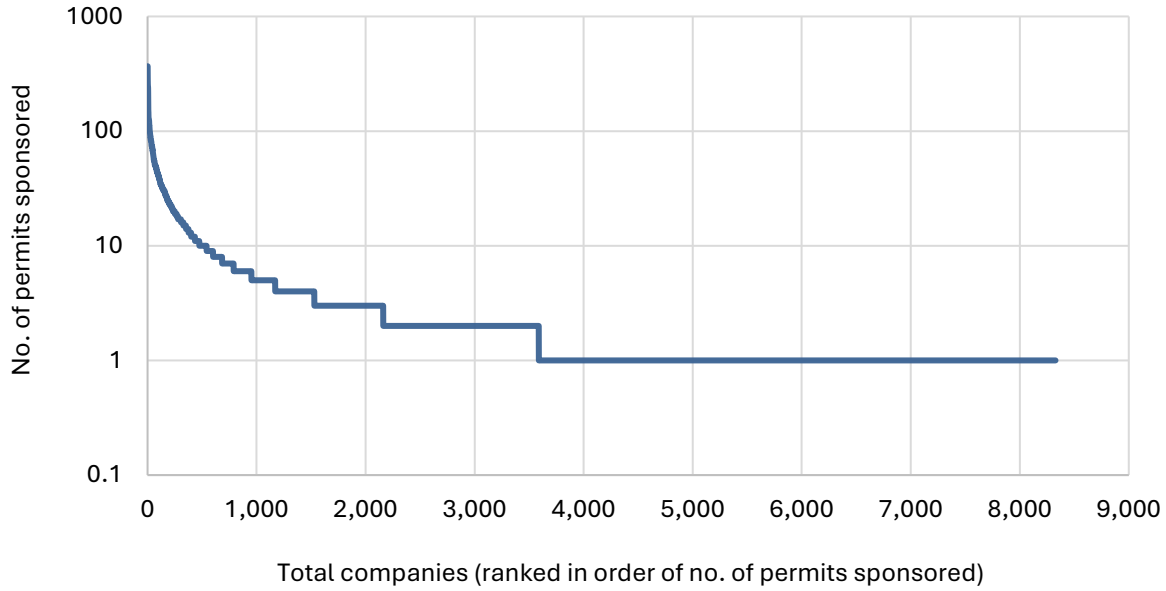
many roles experiencing skills shortages are recruited for under the General EP, such as the roles of healthcare assistant, doctors, or bus and coach drivers (DETE, 2026a).

5.6 Employment permits issued by company

In 2025, a total of 8,328 companies recruited foreign workers through the employment permit system according to DETE's public records (DETE, 2026a). This is a significant increase compared to 2021, when employment permits were issued across only 3,370 companies (DETE, 2022). The number of sponsoring companies has grown somewhat steadily after 2021, reaching 6,626 in 2022 (DETE, 2023), 6,754 in 2023 (DETE, 2024b), and 8,062 in 2024 (DETE, 2025f). Notably, the number of permits issued or renewed per employer varies significantly. Figure 5.6 visualises this distribution of employment permits issued per company in 2025 ranked according to sponsorship size. Each point on the x-axis thus represents a single sponsoring company, whereas values on the y-axis indicate the number of permits issued per company.

What we find is a distinctly skewed, long-tail distribution as employment permits are concentrated both at the top and bottom end of that spectrum. Accordingly, only 20 companies sponsored more than 100 permits each, yet together accounted for 3,284 out of 31,044 permits issued in 2025. The vast majority of companies sponsored less than ten permits resulting in the 'long tail' visible in Figure 5.6. In fact, 4,740 companies – more than half of all companies accounted for in this dataset – sponsored just a single employment permit in 2025 (DETE, 2026a).

Figure 5.6 Employment permits per company and sponsorship size, 2025



Source: DETE (2026a).

On the one hand, this pattern suggests a concentrated market in which a small number of high-volume sponsors drive a substantial portion of overall recruitment. The five largest permit sponsors in 2025 were Google Ireland Limited (368 permits), Ernst and Young (278 permits), University Limerick Hospitals Group (251 permits), Amazon Development Centre Ireland Limited (245 permits), and Redwood Extended Care Facility UC (237 permits). Notably, some such companies may additionally operate subsidiaries that are reported separately in DETE's employment permit statistics. For instance, Amazon additionally recruited foreign workers under Amazon Web Services EMEA SARL (236 permits), Amazon Data Services Ireland Limited (154 permits), and Amazon Data Services Ireland Limited (one permit) leading to a substantially higher overall share of permits.

On the other hand, the majority of employers have participated in the employment permit system with very low sponsorship numbers. This suggests that administrative and financial barriers are low enough that sponsoring a single employment permit is economically viable to employers.

5.7 Employment permits by rate of retention

Lastly, analysing the role of non-EEA workers in meeting Irish labour demand also requires an understanding of how long employment permit holders actually remain in the State. Adequate data on the retention of global talent to Ireland, however, are sparse due to limited

data collection and poor linkages between different datasets. The main challenge in accurately estimating retention stems from the fact that Ireland does not operate any exit checks on its borders. Similar data challenges were reported by other EU countries, as a forthcoming EMN Inform report on talent retention finds (EMN, forthcoming).

Nevertheless, a recent data exercise contained in the in the Department of Finance's (2025b) 'Future Forty' report gives some indication of the lengths of stay among employment permit holders. Using a sample of 350 migrant workers, the authors matched DETE's employment permit data with immigration permission data by DJHAM over a five-year period. Only Critical Skills and General EP holders were considered, however, additionally distinguishing in both cases between workers newly arriving to Ireland and those transitioning from a student permission to an employment permit.

The report's findings indicate relatively low retention outcomes for these migrant cohorts (Department of Finance, 2025b). After two years, 40 per cent of newly arrived Critical Skills EP holders in their sample and 21 per cent of General EP holders had left Ireland. After five years, roughly 60 per cent of Critical Skills workers had left and roughly 50 per cent of workers on the General EP. Notably, retention outcomes for international graduates across both groups are higher, as only 27.2 per cent of Critical Skills EP holders reportedly had left after five years compared with 40 per cent of General EP holders (Department of Finance, 2025b).

These figures suggest a relatively high turnover among workers in the employment permit system. This is especially the case for Critical Skills EP holders – notably, despite their classification as a priority retention cohort by DETE (DETE, 2018; Department of the Taoiseach, 2025). The comparatively higher outcomes for international graduates suggest that policies targeting their workforce inclusion and retention have a positive effect. Better retention and emigration data are however required to more accurately analyse the effect of current retention policies on migrant workers' decision to stay or leave.

Chapter 6

Challenges and opportunities in leveraging labour immigration to Ireland

During data collection, all stakeholders consulted for the research were asked about challenges and opportunities relating to the Irish employment permit system. This chapter summarises their feedback distinguishing between challenges on the one hand (6.1) and good practices (6.2) on the other. A range of barriers is discussed relating to inadequate safeguards and working conditions, access to redress and recourse, family reunification, minimum salary thresholds, the new Seasonal Employment Permit, and difficulties in achieving recognition of foreign qualifications. Good practices were identified regarding several new policy measures introduced under the *Employment Permits Act 2024*, first and foremost the change of employer provision as well as the newly adjusted salary thresholds for international graduates. Stakeholders also welcomed the policy change granting immediate labour market access for spouses and partners, the introduction of a Seasonal Employment Permit, digitalisation, and the safeguarding function behind the Reactivation Employment Permit.

6.1 Barriers and challenges

6.1.1 Working conditions and exploitation

Many challenges identified by stakeholders related to the poor working conditions or insufficient safeguards of employment permit (EP) holders. NGOs and trade unions reported on a high incidence rate of exploitation mainly, but not exclusively, among General EP holders. The most common forms of mistreatment cited were unpaid wages, inadequate provision of accommodation, or workers being forced to work excessive hours, not given adequate breaks, or subjected to discrimination and unfair treatment.[204]

A recent survey by MRCI gathered the experiences of a sample of 1,019 General EP holders and found that, within that sample, breaches were relatively widespread, with 71 per cent of their survey respondents reporting at least one such violation during their employment in Ireland

[204] Interview with ICI, July 2025, Interview with MRCI, June 2025; Interview with Unite the Union, July 2025; Interview with Doras, June 2025; Interview with the WRC, July 2025.

(MRCI, 2026).[205] MRCI further qualifies that, in their experience, some of the roles subjected to exploitation were only made eligible after 2021 and thus may be insufficiently regulated as relatively new additions to the employment permit system. This applies, for instance, to the roles of healthcare assistant, meat processing operative, chef and dairy farm assistant, says MRCI.[206]

Generally, stakeholders reported that mistreatment is most common within the Healthcare, Agri-food, Fisheries, and Hospitality sectors, where pay and working conditions are already relatively poor.[207] Accordingly, it may be the case that some of the issues described above reflect in fact sector-wide challenges. Yet we find that migrant workers (employment permit holders and other) are frequently overrepresented in those same sectors. For instance, the SLMRU reports one of the highest shares of non-Irish citizens in food processing roles (McNaboe et al., 2025b). Unsafe working conditions, long working hours, low pay, as well as poor health and safety practices are frequently reported for this work, especially in the meat industry (Maher and Cawley, 2016; MRCI, 2020; McNaboe et al., 2025b). In fact, job attractiveness is among the main reasons why employers struggle to find food processing workers domestically (McNaboe et al., 2025b). Similarly, working conditions across different healthcare roles are consistently reported as challenging, albeit for different reasons. Long working hours, limited career progression, and high levels of stress are consistently reported by healthcare staff across skill levels and nationalities (Brugha et al., 2016; Heffron & Socha-Dietrich, 2019). The SLMRU estimates that around 31 per cent of all nurses and midwives in Ireland and around 29 per cent of all healthcare assistants (total includes certain other care roles) are non-Irish citizens.

In addition to overrepresentation,[208] NGOs and prior research (Krings et al., 2011; Murphy et al., 2020; O'Sullivan and Murphy, 2022) further

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205 The MRCI survey gathered the experiences of a sample of 1,019 General EP holders between 23 July 2025 and 25 February 2026. Respondents were recruited via MRCI's email or phone (405 responses), through colleagues or friends (189 responses), via social media (189 responses), MRCI's Information and Support Centre (22 responses) and other (40 responses). MRCI's own clients thus likely account for a significant share of survey respondents. More information on the project's sampling and research methods is available at: https://www.mrci.ie/tied-to-exploitation-experience-of-migrant-workers-in-ireland/

206 Interview with MRCI, June 2025.

207 Interview with ICI, July 2025; Interview with MRCI, June 2025; Interview with Unite the Union, July 2025.

208 Interview with ICI, July 2025; Interview with MRCI, June 2025.

highlight the added structural vulnerability that employment permit holders can experience. Due to dependence of both their income and right to reside in Ireland on continued employment, this group faces a greater degree of dependency on their employer, potentially making it more difficult to leave or challenge poor working conditions.

Challenges relating to ethical recruitment and safe working conditions for migrant workers were also reported by Austria, Belgium, Czechia, Germany, Finland and Lithuania in the 2025 EMN Study (EMN, 2025). Similar to policy debates on the Irish change of employer provision, Belgium, for instance, reported challenges in balancing robust legal safeguards for migrant workers while also maintaining enough flexibility in the system to meet emerging labour market needs quickly and effectively (EMN, 2025). As the study asked about challenges relating to economic migration policy more broadly, rather than about the adequacy of safeguards specifically, other countries may face similar issues without having explicitly reported them.

6.1.2 Access to recourse and redress

NGOs further state that migrant workers experiencing exploitation face barriers in their access to recourse and redress, challenges highlighted also by prior research (Coghlan and Wylie, 2011; Murphy et al., 2020).[209] Generally, where a migrant worker experiences a breach of their employment conditions, they may lodge a complaint with the Workplace Relations Commission (WRC).[210] Stakeholders[211] consulted for this report as well as prior research (Stapleton et al., 2024; Murphy et al., 2020) highlighted that an insufficient number of WRC inspectors, however, limits the body's capacity to effectively monitor compliance with employment legislation. MRCI contextualised this by noting that while the number of employment permits issued has increased significantly in recent years, staff and resources in bodies such as the WRC have generally not kept pace.[212]

Moreover, MRCI found that within their surveyed sample of General EP holders (see MRCI, 2026), only 9 per cent of those who reported an issue externally (e.g. to the WRC, An Garda Síochána, NGOs or unions) managed to resolve the matter positively. Stakeholders also flagged that where employment of migrants is irregular or illegal, the WRC

209 Interview with Doras, June 2025; Interview with MRCI, June 2025.
210 Interview with the WRC, July 2025.
211 Interview with ICI, July 2025; Interview with MRCI, June 2025.
212 Interview with MRCI, June 2025; Interview with ICI, July 2025.

cannot offer any support as the body may only enforce legal employment contracts and legislation.[213]

Stakeholders also found that many employment permit holders experiencing exploitation or mistreatment do not report it.[214] This can be for various reasons. For one, employment permit holders may be unable to recognise where they find themselves in a situation of exploitation or mistreatment due to significant information and awareness gaps (Murphy et al., 2020). Doras reports that, for instance, several of their migrant clients did not know that employers are not allowed to confiscate passports.[215] Even where the permit holder is aware of the unlawfulness of their treatment, migrants may nevertheless choose to remain silent out of fear of jeopardising their employment or immigration status.[216] ICI, Unite the Union and the WRC all experienced clear hesitancy among migrants to engage with state authorities (including An Garda Síochána, the WRC, or the Residential Tenancies Board) out of fear their residency permission or employment permit may be revoked. MRCI further comments that leaving an exploitative workplace is only a realistic option where another legal form of employment is readily available as both income and residence permission depend entirely on that employment.[217] Only since the passing of the *Employment Permits Act 2024* may Critical Skills and General EP holders change employer after a nine-month period.[218]

More broadly, some stakeholders criticised that current legislation is insufficient in ensuring effective deterrence and adequate access to recourse. Where employer sanctions are predominantly monetary in nature, companies are not effectively deterred from engaging in abuse or exploitation, according to MRCI and Doras.[219] Even where a WRC complaint is lodged and results in a positive outcome, the Commission may only mandate that the employer pays back wages owed to the

213 Interview with Unite the Union, July 2025; Interview with the WRC, July 2025.
214 Interview with Doras, June 2025; Interview with MRCI, June 2025; Interview with Unite the Union, July 2025.
215 Interview with Doras, June 2025.
216 Interview with ICI, July 2025; Interview with Unite the Union, July 2025; Interview with the WRC, July 2025.
217 Interview with MRCI, June 2025.
218 *Employment Permits Act 2024* (No. 17 of 2024), commenced by 'S.I. No. 443/2024 - *Employment Permits Act 2024* (Commencement) Order 2024'.
219 Interview with Doras, June 2025; Interview with MRCI, June 2025.

employee.[220] Doras and MRCI criticised this.[221] MRCI has also previously called for introducing a criminal offence for employers committing cases of severe exploitation (MRCI, 2026). Unite the Union specifically criticised this circumstance in the context of the Fisheries sector: they say that even though cases of exploitation and trafficking are well documented and reported[222] (and resulted in the closing of the AWS for these roles as discussed in Section 4.3), none of the vessel owners responsible for trafficking have been prevented from sponsoring further permits, according to the trade union.[223]

Notably, the Employment Permits Act grants the Minister discretion to refuse employers from sponsoring permits where they are known to have previously breached employment permit law.[224] DETE reports that since 2025, six applications were refused on these grounds (one of which was successfully appealed).[225]

Lastly, ICI criticised that the threshold for recognising labour-related trafficking is very high, undermining its effectiveness (see also Coghlan and Wylie, 2011), and that there is no legal aid available for migrant workers reporting discrimination specifically.[226] Unite the Union flagged that unfair dismissal protections are only accessible to migrant workers where the employee-employer relationship is at least 12 months long.[227] Similar to the waiting period for the change of employer policy, this can work to disadvantage workers in their access to recourse where their employment permit has commenced only recently. Lastly, MRCI highlighted a legislative gap where the regulation of foreign recruitment agencies is concerned.[228] Frequently, intermediaries based in countries of origin (and/or in Ireland) assume an instrumental role in the recruitment of foreign workers, for instance by organising transfer to Ireland and charging fees (sometimes of quite large amounts) to migrant workers for it (MRCI, 2026). Especially where

220 Interview with the WRC, July 2025.
221 Interview with Doras, June 2025; Interview with MRCI, June 2025.
222 See, for instance, Joint Committee on Business, Enterprise and Innovation (2017). 'The situation of non-EEA crew in the Irish Fishing Fleet under the Atypical Worker Permission Scheme'; MRCI (2017). 'Left High and Dry: The Exploitation of Migrant Workers in the Irish Fishing Industry'. Available at: www.mrci.ie; US Department of State (2017). '2017 Trafficking in Persons Report: Ireland'. Available at: https://www.state.gov/reports/2017-trafficking-in-persons-report/ireland/
223 Interview with Unite the Union, July 2025.
224 Interview with the WRC, July 2025.
225 Correspondence with DETE, July 2026.
226 Interview with ICI, July 2025.
227 Interview with Unite the Union, July 2025.
228 Interview with MRCI, June 2025.

these intermediaries are based in third countries there is very limited oversight or regulation, undermining the 'Employer Pays' principle (according to which the worker should not bear any costs related to their recruitment and deployment).[229] NGOs argue that especially in a context where foreign recruitment to lower-skilled and lower-paid jobs is more common than it was a few years ago, the State must ensure that better safeguards are in place to protect General EP holders from exploitative employers.[230]

6.1.3 Unequal rights

More generally, Doras and MRCI criticised that the employment permit system maintains a tiered rights regime between Critical Skills EP holders on the one hand and General EP holders on the other.[231] As Section 4.2 explained, residency and employment rights differ significantly between the two permit groups. Accordingly, Critical Skills EP holders enjoy immediate access to family reunification, may apply for a Stamp 4 permission after just two years, and have greater freedom to change jobs (DETE, 2025b). General EP holders, in contrast, may only reunify with their families after a minimum waiting period of 12 months, apply for the Stamp 4 only after five years, and change employer only where the new role is exactly the same as was with their original employer (DETE, 2025g).

It is relatively common across the EU for Member States to offer differing admission, residency or employment conditions depending on the migrant workers' skill level and qualifications (Devitt, 2024; EMN, 2025). DETE explains that the Department maintains more attractive residency conditions for Critical Skills workers, as their skills are deemed critically important to growing Ireland's economy and are in significant shortage of supply (DETE, 2025g). MRCI criticises this as unjustified also because the number of General EPs issued has increased significantly in recent years indicating a clear reliance on medium and lower-skilled foreign labour (Section 5.2 shows that slightly more General EPs were issued in 2024 than Critical Skills EPs).[232] According to MRCI and Doras, the significant contribution of General EP holders to the Irish labour market and economy can be at odds with the limited set of rights granted to them while working in

229 Interview with MRCI, June 2025.
230 Interview with ICI, July 2025; Interview with MRCI, June 2025.
231 Interview with Doras, June 2025; Interview with MRCI, June 2025.
232 Interview with MRCI, June 2025.

Ireland.[233] Fragomen adds that retention of international students specifically can be undermined where employers can only hire through the General EP due to the less attractive conditions attached to it.[234]

6.1.4 Family reunification challenges

Beyond unequal access to the right to family reunification, challenges were also raised regarding the process and practicalities of bringing non-EEA family members to Ireland as an employment permit holder.[235] Stakeholders mainly criticised the immense delays in processing applications and in issuing the 'join family' visa following a positive decision.

MRCI emphasises that prolonged family separation can cause severe emotional distress for migrants and impedes integration into Irish society.[236] Withholding or impeding family reunification is also at odds with the significant contribution migrants make to the Irish labour market and economy, say NGOs.[237] Prolonged family separation also jeopardises talent retention efforts. Stakeholders accordingly reported on experiences where significant delays in reunifying with family members resulted in the foreign worker terminating their employment and prematurely departing from Ireland.[238]

Achieving family reunification is particularly challenging for workers from visa-required countries: anecdotal evidence points to business preference in hiring employment permit holders from non-visa required countries where long visa processing times make recruitment an inefficient and costly option.[239] A forthcoming ESRI-EMN report discusses challenges surrounding non-EEA family reunification in greater detail, reporting on overall processing times between one and two years in some cases (Dalton and Hahn, forthcoming). A forthcoming EMN Inform report on talent retention identifies family unity as an important factor shaping migrant workers' decision to stay or leave their EU host country (EMN, forthcoming).

233 Interview with MRCI, June 2025.
234 Interview with Fragomen, July 2025.
235 Interview with ICI, July 2025; Interview with MRCI, June 2025; Interview with Fragomen, July 2025.
236 Interview with MRCI, June 2025.
237 Interview with MRCI, June 2025.
238 Interview with Fragomen, July 2025.
239 Interview with Fragomen, July 2025.

6.1.5 Minimum Annual Remuneration

Challenges were also raised regarding the Minimum Annual Remuneration (MAR) thresholds. Stakeholders mostly reported difficulties in managing and complying with the level of the thresholds specifically. Employers' unions and immigration consultancies noted that the thresholds were sometimes set so high that foreign recruitment was no longer a cost-effective option even where skills were very difficult to source nationally.[240] This barrier affected small and medium-sized businesses as well as corporations outside of Dublin the most.[241]

Where the MAR is too high, employers may prefer, consequently, to hire migrants with immigration statuses to which no salary requirements apply.[242] This is particularly the case for international students. Fragomen and DJHAM noted that frequently Irish employers hire international students more willingly while still registered on the Stamp 1G status, but subsequently may hesitate to sponsor them on an employment permit.[243] No salary or occupation-specific restrictions apply under the Stamp 1G, but in order to retain a student through the employment permit system, employers had to previously comply with a MAR of €36,605 (General) or €40,904 (Critical Skills). Generally, Fragomen commented that the Critical Skills-specific MAR exceeds standard salaries for many graduates newly entering the Irish labour market. In such a context, talent retention is impeded where hiring an international graduate is more expensive than a local one.[244] Where there is a mismatch between the previous salary and the MAR, employers may thus opt not to retain the student due to the additional costs.[245] DJHAM also reflected on past instances where some employers tried to circumvent the salary requirements by hiring a student on a Stamp 1G, but letting them go shortly after in order to rehire them on the Reactivation Employment Permit.[246] Importantly, as of 1 March 2026, DETE adjusted the MAR for graduates in response to

240 Interview with Fragomen, July 2025; Interview with Chambers Ireland, June 2025.
241 Interview with Chambers Ireland, June 2025.
242 Interview with DJHAM (B), June 2025; Interview with Fragomen, July 2025; Interview with Chambers Ireland, June 2025.
243 Interview with DJHAM (B), June 2025; Interview with Fragomen, July 2025.
244 Interview with Fragomen, July 2025.
245 Interview with DJHAM (B), June 2025; Interview with Fragomen, July 2025.
246 Interview with DJHAM (B), June 2025.

these issues. Section 6.2.3 further discusses this policy change as a good practice.

NGOs and trade unions, in contrast, criticised that many migrant workers are not paid a fair wage where MAR thresholds are set too low.[247] This affects primarily lower-skilled roles in agriculture and food production as well as in healthcare that are sponsored on the General EP (DETE, 2025d). During data collection in June and July 2025, several roles continued to be remunerated at an exceptionally low MAR where permits had been issued or renewed prior to January 2025.[248] This applied in particular to the role of healthcare assistant, which makes up a large number of employment permit holders in the Healthcare sector.[249] Healthcare assistants were initially exempted from earlier MAR increases and thus continued to be remunerated at €27,000 where those permits had been issued or renewed before January 2025 excluding them from access to family reunification (which applied a €30,000 income requirement at the time).[250] DETE emphasises that while lower than other EP salaries, the healthcare assistant-specific MAR was still above the Irish minimum wage (€13.50 per hour) even for those permits that temporarily continued to be remunerated at €27,000.[251] As of summer 2026, most newly issued and renewed General EPs are remunerated at a MAR of €36,605 while meat processing operatives, horticultural workers, healthcare assistants, and home carers are remunerated at a MAR of €32,691 (DETE, 2025d).

ICI and MRCI also criticised the level of the MAR thresholds in relation to family reunification specifically.[252] While the most recent MAR increases for March 2026 were set by the Department to meet the financial requirement in place for reunification with spouses/de facto partners, higher requirements apply for children. This means that General EP holders remunerated at the MAR of €36,605 are unable to exercise the right to reunify with one or more children for the duration of their permit.

247 Interview with MRCI, June 2025.
248 Correspondence with DETE, June 2025.
249 Minister for Enterprise, Tourism and Employment (27 January 2026). 'Written response to Parliamentary Questions 430, 431, 432, 433 on 'Work Permits'.'
250 Interview with MRCI, June 2025.
251 Correspondence with DETE, June 2025.
252 Correspondence with ICI, June 2026; Correspondence with MRCI, June 2026.

More generally, NGOs criticise that the MAR system discriminates between two classes of workers, Irish and foreign ones.[253] This can create animosity and competition between local and migrant workers where either group is paid a significantly lower (or higher) wage for the same work. A sector-wide minimum wage, MRCI argues, would resolve this tension and ensure that all workers are paid a fair wage regardless of nationality and migration status.[254] This would also incentivise employers to only hire migrant workers where there is a genuine labour shortage and not where it is simply cheaper than hiring locally. Trade unions and NGOs supported a similar proposal during the latest public consultation for the review of MAR thresholds in 2025 (DETE, 2025d).

The different perspectives on challenges in this area show the overall challenge of balancing the interests of Irish nationals, migrant workers, and employers in this area. DETE emphasises that the MAR system aims to guarantee that migrant workers are net contributors to the Irish economy, have the financial capacity to support a decent quality of life for themselves without undue recourse to State resources, and that the risk of wage suppression is minimised (DETE, 2025d).

While some form of salary requirement is generally common across the EU, certain countries have found alternative means to ensure migrant workers are paid fair salaries (EMN, 2025). Germany, for instance, does not operate a migrant-specific MAR, but instead requires that migrant and national workers receive the same pay for the same work. Legislative changes in 2020 and 2023 also removed the requirement on employers to employ a labour market needs test (BAMF Germany, 2025). This aims to ensure that, firstly, migrant workers are paid a fair wage and that, secondly, employers only recruit internationally where their labour needs stem from genuine shortages and not, for instance, wage levels that are unattractive to domestic workers.

Lastly, most stakeholders reported challenges with the process of reviewing, updating and communicating the MAR thresholds. Fragomen and Chambers Ireland criticised that amendments to the thresholds are often implemented at very short notice. This leaves insufficient time to effectively incorporate the changes into business planning or to communicate the new rules to employment permit

253 Interview with MRCI, June 2025.
254 Interview with MRCI, June 2025.

holders.[255] Employers generally maintain that effective business planning requires maximum flexibility and certainty. Where the salary requirements for migrant workers change suddenly, these principles are undermined.[256] MRCI further raised that it is a confusing feature of the system to apply MAR changes to both newly issued permits and renewals. According to the NGO, several General EP holders faced difficulties at renewal of their permit where employers refused to meet the new income thresholds.[257] Under the *Employment Permits Act 2024*, an annual indexing of MAR thresholds was implemented which is intended to bring greater certainty and transparency to the salary requirements, according to DETE (2024a).

6.1.6 New Seasonal Employment Permit

Concerns were also raised in the context of the new Seasonal EP that was piloted throughout 2025.[258] Several NGOs commented that the short-term nature of the scheme is expected to heighten the risk of exploitation and reduce migrants' chances of achieving redress. MRCI and ICI reported that in their experience, exploitation is generally most common in the labour-intensive Agriculture and horticulture sectors, the same sectors to which seasonal workers are recruited.[259] Where migrants are only staying in the State for a brief period of time, it is unlikely they will be able to seek legal recourse or lodge a WRC complaint during their stay in case of mistreatment.[260] Broader problems with workplace protections, such as a low number of WRC labour inspectors and frequent information and awareness gaps among migrant workers, are likely to worsen the issue, argue NGOs.[261]

The Department introduced several safeguards under the scheme intended to minimise risks for seasonal workers. These safeguards include requiring employers to obtain annual approval as seasonal sponsors as well as strict requirements to provide adequate pay, health insurance, and rental accommodation.[262]

A review of the permit accompanied the 2025 pilot, the findings of which will inform the future regulation of the scheme. Indeed, the

255 Interview with Chambers Ireland, June 2025; Interview with Fragomen, July 2025.
256 Interview with Chambers Ireland, June 2025.
257 Interview with MRCI, June 2025.
258 Interview with ICI, July 2025; Interview with MRCI, June 2025; Interview with Doras, June 2025.
259 Interview with ICI, July 2025; Interview with MRCI, June 2025.
260 Interview with MRCI, June 2025.
261 Interview with ICI, July 2025; Interview with MRCI, June 2025.
262 S.I. No. 33/2025 - Employment Permits (Amendment) (Seasonal Employment) Regulations 2025.

initial phase of the pilot revealed significant vulnerabilities (DETE, 2026d). These included compliance breaches where the Approved Seasonal Employer relocated their workers to an undeclared location without notifying the Department undermining effective oversight. The limited uptake of the pilot (one employer and 23 workers) further made it difficult to fully test the pilot. DETE thus recommended a second pilot phase with broader participation for the 2027 season to test the scheme's strengths and vulnerabilities more fully (DETE, 2026d).

6.1.7 Recognition of qualifications

Issues were also encountered in achieving formal recognition of foreign qualifications, particularly in the context of regulated professions. Stakeholders highlighted that the recognition process in Ireland can be very difficult to navigate because it is fragmented, lengthy, and at times expensive.[263] One of the main barriers is the lack of a central point of contact for achieving qualification recognition.[264] This is because each regulated profession has its own competent authority which applies differing recognition processes and fees.[265] Reportedly, competent authorities may also become overwhelmed with the task of reviewing and validating at times highly specific qualifications from a range of different issuing countries.

Doras explained that this is particularly an issue in the healthcare and care professions as well as in social work and teaching – all sectors currently experiencing skills shortages.[266] For instance, nurses holding a qualification obtained outside of the EU must usually complete a conversion course for four to five months before they may work as a registered nurse in Ireland. Where this is not a realistic option due to time or financial constraints, qualified migrants can end up in professions well below their skill level. Foreign nurses without recognised qualifications may, for instance, end up working as healthcare assistants which results in lower pay and in different work responsibilities. DJHAM highlights that the Atypical Working Scheme seeks to support the recognition and adaption of qualifications for nurses and midwives by providing a temporary admission into the State

263 Interview with Doras, June 2025; Interview with DJHAM (C), June 2025; Interview with SOLAS (A), June 2025; Interview with BITC, June 2025.
264 Interview with Doras, June 2025.
265 Interview with Doras, June 2025; Interview with DJHAM (C), June 2025.
266 Interview with Doras, June 2025.

for the specific purpose of achieving registration with the Nursing and Midwifery Board of Ireland (DJHAM, 2026a).

While an issue for migrant workers across the board, stakeholders highlighted that skills recognition challenges disproportionately affect migrants outside of the employment permit system such as beneficiaries of international and temporary protection – migrant groups outside of the scope of this report.[267] International students, in contrast, are least affected by recognition challenges where they have obtained all or most of their qualifications inside the State. Challenges in achieving recognition of foreign qualifications is an issue shared by several other EU countries (EMN, 2025).

6.1.8 Other challenges

Other barriers identified by stakeholders include the €300 renewal fee for the Irish Residence Permit Card. MRCI argues the high fee can create an undue financial burden for the employment permit holder, especially for those working in lower-paid sectors.[268]

While Fragomen welcome that many construction roles have been made newly eligible for the employment permit system, it is an issue that these were not included on the Critical Skills Occupations List. As a consequence, construction roles may only be sponsored on the General EP with concerns about limited access to family reunification.[269]

SOLAS pointed out that it is much more difficult for small and medium sized companies to hire from abroad pointing to a lack of resources and awareness.[270] Recruitment through the employment permit system is also geographically concentrated in Dublin (where over 50 per cent of sponsoring companies are situated), suggesting that rural companies more rarely access the employment permit system.

Lastly, ICI and SOLAS reported broader structural factors such as the high cost of living and housing as a barrier to meeting labour demand through immigration. These make Ireland less attractive as a destination for foreign talent and put migrant workers at risk, a group

267 Interview with Doras, June 2025; Interview with DJHAM (C), June 2025; Interview with SOLAS (A), June 2025.
268 Interview with MRCI, June 2025.
269 Correspondence with Fragomen, June 2026.
270 Interview with SOLAS (A), June 2025.

generally more affected by discrimination in the rental market.[271] The OECD also highlighted this effect, underlining that housing affordability is predominantly an issue in the recruitment of low- and medium-income workers (OECD, 2025).

6.2 Opportunities and good practices

Stakeholders also identified a range of good practices when effectively leveraging labour immigration or safeguarding employment permit holders. Several such practices are policy changes introduced under the *Employment Permits Act 2024* and related legislative amendments.

6.2.1 Change of employer policy

Crucially, the *Employment Permits Act 2024* introduced a provision under which all Critical Skills and General EP holders may change employer after nine months on their original permit.[272] In exceptional circumstances, such as redundancy or proven cases of exploitation, a change of employer process may also be initiated within the first nine months. Prior to this policy, changing employer required an entirely new permit application resulting in an additional investment of time and money from the migrant worker.

The change of employer provision was explicitly welcomed by all NGOs and trade unions consulted for this research.[273] Being able to easily change employers can discourage mistreatment where employers are aware that they may lose the worker to another company, according to stakeholders. Some NGOs nevertheless criticised that the nine-month waiting period remains a barrier.[274] MRCI stressed that the safeguard is only as effective as the extent to which it is a realistic and accessible option for migrants, and advocated for a shorter or no waiting period.[275] DETE explains that the waiting period aims to strike a balance between ensuring certainty that workers will remain within their employment for a reasonable period of time, and not unduly binding migrant workers to their employer (DETE, 2025a).

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271 Interview with SOLAS (A), June 2025; Interview with ICI, July 2025.

272 *Employment Permits Act 2024* (No. 17 of 2024), commenced by 'S.I. No. 443/2024 - *Employment Permits Act 2024* (Commencement) Order 2024'.

273 Interview with MRCI, June 2025; Interview with Doras, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025; Interview with Fragomen, July 2025; Correspondence with DETE, June 2025.

274 Interview with MRCI, June 2025; Interview with Doras, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025.

275 Interview with MRCI, June 2025.

6.2.2 Immediate labour market access for family members

DETE and DJHAM also recently changed the work permissions for family members of employment permit holders, specifically those of spouses/de facto partners as well as of children aged 16-18 years.

In 2024, DJHAM began registering spouses and de facto partners of Critical Skills and General EP holders on the Stamp 1G immigration permission instead of the Stamp 3 (DJHAM, 2024a). The Stamp 1G grants automatic and unrestricted access to the labour market. Under the previous permission (Stamp 3), spouses had to apply for a separate employment permit should they wish to engage in employment in Ireland. The policy change was highlighted as a good practice by several stakeholders consulted for this report.[276] ICI and MRCI reported that the previous Stamp 3 permission frequently caused issues for spouses because their income and immigration permission was fully dependent on their spousal sponsor.[277] This dependency, NGOs argue, significantly heightened the risk of abuse and exploitation, especially among migrant women.[278] DJHAM specifically described the policy change as a welcome example of a more holistic and strategic approach towards labour migration.[279]Accordingly, the policy activates parts of the existing migrant population into the labour force, complementing the talent attraction approach inherent to the employment permit system.

In 2025, DJHAM applied a similar approach to children aged 16-18 years that join a parent employment permit holder in Ireland. Going forward, all children of that age group are automatically registered on the Stamp 1G, granting them similarly unrestricted access to the Irish labour market (DJHAM, 2025).

6.2.3 Adjusted salary threshold for international graduates

A positive policy change is also DETE's decision to lower the MAR thresholds for international graduates to €34,009 (General EP) and €36,848 (Critical Skills EP) in 2025.[280] While the policy change occurred after data collection was already concluded, several stakeholders reported previous barriers where the MAR level impeded the retention

276 Interview with MRCI, June 2025; Interview with ICI, July 2025; Interview with DJHAM (B), June 2025; Interview with DJHAM (C), June 2025; Correspondence with Fragomen, June 2026.
277 Interview with MRCI, June 2025; Interview with ICI, July 2025.
278 Interview with ICI, July 2025.
279 Interview with DJHAM (C), June 2025.
280 S.I. No. 643/2025 - Employment Permits (Amendment) (No. 5) Regulations 2025.

of foreign graduates of Irish universities because employers were unwilling to pay a salary higher than what is common for early career professionals locally. Such experiences were reported by Fragomen, Doras and DJHAM.[281] According to DETE, the policy was changed to improve the retention of international talent in recognition that foreign graduates account for a significant proportion of Critical Skills EP applicants.[282]

6.2.4 New Seasonal Employment Permit

Several stakeholders also welcomed the introduction of the Seasonal EP as a welcome addition to the employment permit system. DJHAM, Chambers Ireland and SOLAS all reported on the added degree of flexibility that the new permit offers in addressing seasonally occurring skill and labour needs.[283] Chambers Ireland specifically commented that as flexibility and certainty are key for effective business planning, the Seasonal EP offers a welcome recruitment option where the General or Critical Skills EP are unable to facilitate short-term recruitment of foreign workers.[284] SOLAS raised that, from a skills perspective, the new permit is a promising pathway that is sufficiently responsive to the time-sensitive and time-bound labour demands that are common in the Agricultural sector.[285] While several other NGOs viewed the introduction of the Seasonal EP more critically (see Section 6.1.5), Doras offered the view that a seasonal permit can offer a promising pathway for migrant workers to temporarily try work and life in Ireland before 'committing' to a more permanent employment and immigration route.[286]

6.2.5 The Reactivation Employment Permit

Several stakeholders specifically referenced the Reactivation EP as a good practice.[287] The permit functions as an important safeguard for employment permit holders who lose their job through no fault of their own including in cases of exploitation or a sudden cancellation/non-renewal of their permit unrelated to the permit-holder's performance.

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281 Interview with DJHAM (B), June 2025; Interview with Fragomen, June 2025; Interview with Doras, June 2025.

282 S.I. No. 643/2025 - Employment Permits (Amendment) (No. 5) Regulations 2025.

283 Interview with DJHAM (C), June 2025; Interview with SOLAS (B), June 2025; Interview with Chambers Ireland, June 2025.

284 Interview with Chambers Ireland, June 2025.

285 Interview with SOLAS (B), June 2025.

286 Interview with Doras, June 2025.

287 Interview with MRCI, June 2025; Interview with ICI, July 2025; Interview with Unite the Union, July 2025.

MRCI highlighted that the permit stands out EU-wide and helps migrant workers to navigate safely and legally out of exploitative or abusive working conditions.[288] Yet the Reactivation EP is not without limitations, as MRCI and Unite the Union discussed. Migrants cannot engage in employment while their application is being reviewed, which leaves them without a regular, legal source of income for the duration of that process (usually several months).[289] Similarly, MRCI further commented that the process is somewhat cumbersome as permit holders must complete two separate applications, first with DJHAM and subsequently with DETE (MRCI, 2026). MRCI also argues that the €1,000-high permit fee creates an undue burden for the applicant, considering these migrants are a particularly vulnerable cohort and, in their experiences, only resort to the Reactivation EP as a very last resort (MRCI, 2026).

6.2.6 Digitalisation and launch of Employment Permits Online

Positive stakeholder feedback was further received in regard to recent digitalisation efforts. Particularly, the creation of the Employment Permits Online (EPO) portal which henceforth manages all aspects regarding permit applications and renewals was a welcome step according to Doras and Fragomen.[290] Previously, most processes in relation to employment permits required communication via physical mail or email (DETE, 2025j). According to DETE, the portal aims to make the application process easier, more secure and customer-friendly, and create a more efficient and responsive service (DETE, 2025j). Chambers Ireland and Fragomen further welcome the digitalisation of the labour market needs test which previously required placing the job vacancy advert in print media.[291] Since passing of the *Employment Permits Act 2024*, the LMNT was moved fully online.

6.2.7 Other good practices

Unite the Union and WRC welcomed that the WRC website is available in a multitude of languages, which makes their services widely accessible across employment permit holders.[292]

DJHAM described their participation in the SUSTAIN pilot under the Migration Partnership Facility (MPF) pilot as a positive development, as

288 Interview with MRCI, June 2025.
289 Interview with Unite the Union, July 2025; Interview with MRCI, June 2025.
290 Interview with Doras, June 2025; Interview with Fragomen, July 2025.
291 Interview with Fragomen, July 2025; Interview with Chambers Ireland, June 2025.
292 Interview with Unite the Union, July 2025; Interview with the WRC, July 2025.

it gives Ireland an opportunity to explore opportunities and challenges in meeting sectoral needs through bilateral partnerships, prior to a potential scaling-up of this approach in other contexts.[293]

Chambers Ireland more generally reported on positive experiences engaging with DETE and the employment permit system, highlighting that their business input was often positively accommodated, as was the case during the initial deferral of the MAR increases.[294]

Lastly, first steps taken by the Government in the direction of implementing a single permit procedure for employment and immigration permissions were welcomed by ICI and Fragomen. Stakeholders emphasised that a single procedure would significantly reduce the administrative burden on employees and employers engaging in the employment permit system.[295]

293 Interview with DJHAM (C), June 2025; Interview with DJHAM (A), June 2025.
294 Interview with Chambers Ireland, June 2025.
295 Interview with ICI, June 2025; Interview with DJHAM (C), June 2025; Interview with Fragomen, July 2025.

Chapter 7
Conclusion

The challenge posed by Irish labour and skills shortages lies less in their overall scale and more in their concentration across particular sectors and occupations. While indicators such as the job vacancy rate suggest that domestic workforce shortages are less acute than they are in many other EU countries, Ireland faces skills shortages in strategically important sectors such as Construction, Science and engineering, ICT, Health and care work, Education and Transport. Persistent shortages in these fields risk increasing the workload of existing workers, constrain national productivity, and affect government's ability to deliver on national development plans for housing, infrastructure and healthcare (EGFSN, 2024a; KPMG, 2024; Kumar and Donoghue, 2024).

Against this backdrop, Ireland increased its recruitment of non-EEA workers. The use of employment permits more than doubled between 2021 and 2022, decreasing slightly to 31,044 newly issued/renewed permits in 2025. Notably, our research found that the number of sponsoring companies and economic sectors recruiting through the employment permit system has both grown and diversified. More employers are now relying on non-EEA recruitment across more roles and sectors. Despite the predominance of skills shortages, we find that the issuing of General Employment Permits has especially increased; for the first time since 2016, the Department of Enterprise, Tourism and Employment (DETE) issued more General Employment Permits than Critical Skills ones. While the two main sponsoring sectors – Health and social work as well as ICT – still dominate, we also found that historically smaller sectors such as Accommodation and food services and Construction increased their recruitment of non-EEA workers.

These developments have been facilitated by a series of policy changes making it easier for Irish employers to recruit workers from outside of the EEA. One of the most significant changes was DETE's decision to broaden the list of eligible occupations in 2021 and again in 2023. This opened the employment permit system to roles that were previously excluded from foreign recruitment. The inclusion of healthcare assistants in 2021 is one example, a role which has since become key to meeting skills shortages in the Healthcare sector. The

Employment Permits Act 2024 further modernised and expanded the system, digitalising most processes and establishing an additional recruitment pathway through the Seasonal Employment Permit. Instruments such as the Critical Skills and Ineligible Occupations Lists, the labour market needs test, minimum remuneration thresholds, and the 50:50 rule were all revised as part of the 2024-2025 reforms.

As the system expands, attention has also turned to the protection of migrant workers in Ireland. The *Employment Permits Act 2024* introduced additional safeguards, most notably a change of employer provision, intended to protect workers across all skill levels. Yet our research shows that many migrants remain unaware of the availability of these provisions, or simply do not recognise where they find themselves in situations of exploitation. The impact of such reforms is also undermined where enforcement capacity is stretched, as highlighted in relation to the limited number of inspectors at the Workplace Relations Commission. NGOs report that breaches of employment conditions are particularly common among General Employment Permit holders and in newer occupations within the system, including meat processing operatives, healthcare assistants and home carers. Strengthening awareness and information provision, improving communication with the migrant workers directly, and ensuring adequate enforcement resources are in place, could help address these issues. While recent reforms have strengthened safeguards, their impact will ultimately depend on how well they are understood and implemented across workplaces.

Beyond the employment permit system itself, a range of related policies shape migrants' engagement with the labour market. These include improving the access to family reunification, reducing visa processing times, faster and more affordable qualification recognition, and improvements in job quality and pay. Notably, migrant groups other than employment permit holders, such as family members and beneficiaries of international protection may also contribute to meeting Irish labour and skills needs; however as they fall outside the scope of the employment permit system, they were not separately discussed in this report. Telling in that regard is however the role of international students: our research highlighted that even before transitioning into the employment permit system, students address Irish workforce needs, including in the Hospitality sector. Structural conditions further influence Ireland's attractiveness to foreign workers.

Notable here is, for instance, the shortage in affordable housing, which can discourage some workers from choosing to remain in the State in the long term.

Available data indicate low rates of retention across employment permit holder groups. This is especially the case for Critical Skills workers, of whom 40 per cent reportedly leave Ireland after just two years in Irish employment (Department of Finance, 2025b). Retention outcomes are higher for international graduates transitioning into the employment permit system: after two years, only 20 per cent choose to leave the State. These findings matter to policy debates on addressing labour and skills shortages. High levels of turnover and subsequent emigration may limit the extent to which foreign recruitment provides a sustainable response to our workforce shortages. Yet comprehensive and reliable data in this field are scarce, undermining any analysis of how existing policies and structural conditions influence employment permit holders' decision to stay. A better understanding of migrant workers' retention intentions and the factors shaping them may be needed to better assess the effectiveness of economic migration policy in addressing Irish labour and skills shortages.

References

Anderson, B. and Ruhs, M. (2012). 'Reliance on migrant labour: inevitability or policy choice?', *Journal of Poverty and Social Justice*, 20(1), 23-30.

Arnold, S., Quinn, E., Groarke, S., McGinnity, F. and Durst, C. (2019). *Policy and practice targeting the labour market integration of non-EU nationals in Ireland*. ESRI Research Series Number 89. https://doi.org/10.26504/rs89

Arpaia, A. and Halasz, A. (2023). 'Short- and long-run determinants of labour shortages', *Quarterly Report on the Euro Area*, 22 (1).

BAMF Germany (2025). *Labour migration in times of labour shortages: Study contribution by the German National Contact Point of the European Migration Network*. EMN Template Publication 2/2025. Available at: https://www.bamf.de/SharedDocs/Anlagen/EN/EMN/EMNDeutschlandTemplates/emn-template-2-2025-arbeitsmigration.html?nn=446572

Barrett, A., Bergin, A., Kelly, E. and McGuinness, S. (2016). 'Ireland's recession and the immigrant-native earnings gap', in M. Kahanec and K.F. Zimmermann (eds.), *Labor migration, EU enlargement, and the Great Recession*. Heidelberg: Springer Berlin, pp. 103-122.

Bobek, A., Krings, T., Moriarty, E., Wickham, J. and Salamonska, J. (2008). *Migrant workers and the construction sector in Ireland. A preliminary report from the Migrant Careers and Aspirations research project*, Dublin: Trinity Immigration Initiative, Trinity College Dublin.

Boucher, A. and Gest, J. (2018). *Crossroads. Comparative Immigration Regimes in a World of Demographic Change*. Cambridge University Press. doi.org/10.1017/9781316416631

Brenner, H. and Ahern, W. (2000). 'Sickness absence and early retirement on health grounds in the construction industry in Ireland', *Occupational and Environmental Medicine*, 57(9), 615-620.

Brugha, R., McAleese, S., Dicker, P., Tyrrell, E. Thomas, S., Normand, C. and Humphries, N. (2016). 'Passing through – reasons why migrant doctors in Ireland plan to stay, return home or migrate onwards to new destination countries', *Human Resources for Health*, 14, 35. https://doi.org/10.1186/s12960-016-0121-z

Castles, S. (2006). 'Guestworkers in Europe: A Resurrection?', *International Migration Review*, 40(4), 741-766. https://doi.org/10.1111/j.1747-7379.2006.00042.x

Causa, O., Abendschein, M., Luu, N., Soldani, E. and Soriolo, C. (2022). 'The post-COVID-19 rise in labour shortages', OECD Economics Department Working Papers, No. 1721, OECD Publishing, Paris.

Causa, O., Nguyen, M., Soldani, E. and Tanaka, T. (2024). 'Labour shortages and labour market inequalities: evidence and policy implications', OECD Economics Department Working Papers, No. 1832, OECD Publishing, Paris.

Cedefop (2018). *Skills forecast: trends and challenges to 2030. Luxembourg: Publications Office*. Cedefop reference series, No 108. https://data.europa.eu/doi/10.2801/626296

Cedefop (2023). 'Handling change with care: skills for the EU care sector'. Available at: https://www.cedefop.europa.eu/en/publications/9185

Cedefop (2025). 'Ireland – 2025 Skills forecast'. European Centre for the Development of Vocational Training. Available at: https://www.cedefop.europa.eu/en/country-reports/ireland-2025-skills-forecast

Coghlan, D. and Wylie, G. (2011). 'Defining trafficking/denying justice? Forced labour in Ireland and the consequences of trafficking discourse', *Journal of Ethnic and Migration Studies*, 37(9), 1513-1526.

Condon, N., McNaboe, J., Daly, F., Hogan, A. and Shally, C. (2024). *National Skills Bulletin 2024*. SOLAS. Skills and Labour Market Research Unit. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

Creaton, H., Hogan, K. and Smyth, D. (2025). 'Recent trends in migration flows impacting the Irish labour market'. Working paper. Enterprise Strategy, Competitiveness and Evaluation Division, DETE. Available at: https://enterprise.gov.ie/en/publications/publication-files/recent-trends-in-migration-flows-impacting-the-irish-labour-market.pdf

CSO (2024). 'Population and migration estimates, April 2024'. Available at: https://www.cso.ie/en/releasesandpublications/ep/p-pme/populationandmigrationestimatesapril2024/keyfindings/

CSO (2025a). 'Population and Migration Estimates'. Available at: https://www.cso.ie/en/statistics/population/populationandmigrationestimates/

CSO (2025b). 'A Review of Migration Indicators from Administrative Sources Q3 2022 to Q2 2024'. Available at: https://www.cso.ie/en/releasesandpublications/fp/fp-armias/areviewofmigrationindicatorsfromadministrativesourcesq32022toq22024/

CSO (2026a). 'Earnings and Labour Costs Q1 2025 (Final) Q2 2025 (Preliminary Estimates)'. Available at: https://www.cso.ie/en/statistics/earnings/jobvacancystatistics/

CSO (2026b). 'Population and Migration Estimates'. Available at: https://www.cso.ie/en/statistics/population/populationandmigrationestimates/

CSO (2026c). 'Older person information Hub: Project old age dependency ratio'. Available at: https://www.cso.ie/en/releasesandpublications/hubs/p-opi/olderpersonsinformationhub/ageingpopulation/projectedoldagedependencyratio/

Dalton, C. and Hahn, A.S. (forthcoming). *Family reunification in Ireland*. ESRI Research Series Number.

Department of Education and Skills (2016). 'Ireland's National Skills Strategy 2025'. Available at: https://assets.gov.ie/static/documents/irelands-national-skills-strategy-2025-irelands-future.pdf

Department of Finance (2025a). 'Continuity and Change Examining Recent Trends in the Irish Labour Market'. Available at: https://www.gov.ie/en/department-of-finance/publications/continuity-and-change-examining-recent-trends-in-the-irish-labour-market/

Department of Finance (2025b). 'Future forty: Irelands demographic outlook. Trends and Scenarios for the next forty years'. Available at: https://www.gov.ie/en/department-of-finance/publications/future-forty-publications/

Department of Finance (2026). 'Economic Insights – Vol. 1 2026. February 2026'. Available at: https://assets.gov.ie/static/documents/391b8952/Economic_Insights_Volume_1_2026.pdf

Department of Social Protection (2020). 'Labour Market Advisory Council'. Available at: https://www.gov.ie/en/department-of-social-protection/publications/labour-market-advisory-council

Department of the Taoiseach (2025). 'Programme for Government 2025 - Securing Ireland's Future'. Available at: https://www.gov.ie/en/department-of-the-taoiseach/publications/programme-for-government-2025-securing-irelands-future/

DETE (2018). 'Review of Economic Migration Policy. Report of the Inter-Department Group'. Available at: https://enterprise.gov.ie/en/publications/review-of-economic-migration-policy.html

DETE (2022). 'Employment permit statistics 2021'. Available at: https://www.gov.ie/en/department-of-enterprise-tourism-and-employment/collections/employment-permit-statistics-2021/

DETE (2023). 'Employment permit statistics 2022'. Available at: https://www.gov.ie/en/department-of-enterprise-tourism-and-employment/publications/employment-permit-statistics-2022/

DETE (2024a). ‘Employment Permits Act 2024. Information on Key Changes and Developments’. Available at: https://enterprise.gov.ie/en/publications/publication-files/employment-permits-act-2024-information-note-on-key-changes.pdf

DETE (2024b). ‘Employment permit statistics 2023’. Available at: https://www.gov.ie/en/department-of-enterprise-tourism-and-employment/publications/employment-permit-statistics-2023/

DETE (2024c). ‘Minister Higgins announces 150 employment permits for sea fishers’. Available at: https://enterprise.gov.ie/en/news-and-events/department-news/2024/july/03072024.html

DETE (2025a). ‘Changing employer’. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/changing-employer

DETE (2025b). ‘Critical Skills Employment Permits’. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/permit-types/critical-skills-employment-permit/

DETE (2025c). ‘Economic migration policy’. Available at: https://www.gov.ie/en/department-of-enterprise-tourism-and-employment/policy-information/economic-migration-policy/

DETE (2025d). ‘Employment Permits Minimum Annual Remuneration: Outcome of the Roadmap Review 2025’. Available at: https://enterprise.gov.ie/en/publications/employment-permits-mar-roadmap-2025.html

DETE (2025e). ‘Employment permits statistical tables and company listings’, Available at: https://www.gov.ie/en/department-of-enterprise-tourism-and-employment/collections/employment-permits-statistical-tables-and-company-listings

DETE (2025f). ‘Employment permit statistics 2024’, Available at: https://enterprise.gov.ie/en/publications/employment-permit-statistics-2024.html

DETE (2025g). ‘General Employment Permit’. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/permit-types/general-employment-permit

DETE (2025h). ‘Labour Market Needs Test’. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/employment-permit-eligibility/labour-market-needs-test

DETE (2025i). 'Latest employment permits notices and developments'. Available at: from https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates

DETE (2025j). 'Launch of 'Employment Permits Online'. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/latest-updates/new-eps/

DETE (2025k). 'Public consultation on the review of the occupations lists for employment permits'. Available at: https://enterprise.gov.ie/en/consultations/public-consultation-review-of-occupations-lists-for-employment-permits.html

DETE (2025l). 'Welcome to Employment Permits Online'. Available at: https://employmentpermits.enterprise.gov.ie/

DETE (2026a). 'Employment permit statistics 2025'. Available at: https://enterprise.gov.ie/en/publications/employment-permit-statistics-2025.html

DETE (2026b). 'Intra-Company Transfer Employment Permits'. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/permit-types/intra-company-transfer-employment-permit/

DETE (2026c). 'Reactivation Employment Permit'. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/permit-types/reactivation-employment-permit/

DETE (2026d). 'Seasonal Employment Permit Pilot Scheme 2025 Evaluation Report'. Available at: https://enterprise.gov.ie/en/publications/seasonal-employment-permit-pilot-scheme-2025-evaluation-report.html

DETE (2026e). 'Types of employment permits'. Available at: https://enterprise.gov.ie/en/what-we-do/workplace-and-skills/employment-permits/permit-types/permit-types.html

DETE (2026f). 'Report of the review of the occupations lists for employment permits 2025'. May 2026. Department of Enterprise, Tourism and Employment. Available at: https://enterprise.gov.ie/en/news-and-events/department-news/2026/may/20260528.html

DETE (2026g). 'Minister Burke and Dillon announce new employment permits to support homes, health and transport'. Available at: https://enterprise.gov.ie/en/news-and-events/department-news/2026/may/20260528.html

Devitt, C. (2024). 'Comparative labour migration policies' in Meardi, G. (ed.) *Research Handbook on Migration and Employment*. Edward Elgar Publishing, pp. 290 – 308. doi.org/10.4337/9781839107245

DFHERIS (2023). ‘How Ireland predicts what skills it needs’. Department of Further and Higher Education, Research, Innovation and Science. Available at: https://www.gov.ie/en/department-of-further-and-higher-education-research-innovation-and-science/policy-information/how-ireland-predicts-what-skills-it-needs/

DFHERIS (2024). ‘Global Citizens 2030: Ireland’s International Talent and Innovation Strategy’. Available at: https://www.gov.ie/en/department-of-further-and-higher-education-research-innovation-and-science/publications/global-citizens-2030-irelands-talent-and-innovation-strategy/

DFHERIS (2026). ‘National Framework for Meeting Priority Construction Workforce Needs’. Available at: https://www.gov.ie/en/department-of-further-and-higher-education-research-innovation-and-science/publications/national-framework-for-meeting-priority-construction-workforce-needs-2026/

DJHAM (2024a). ‘Attention eligible spouses and partners of General Employment Permit and Intra-Corporate Transferee Irish Employment Permit holders’. Available at: https://www.irishimmigration.ie/attention-eligible-spouses-and-partners-of-general-employment-permit-and-intra-corporate-transferee-irish-employment-permit-holders/

DJHAM (2024b). ‘Ministers McEntee and Burke welcome agreement on actions to increase the competitiveness of Ireland in attracting key skills’. Available at: https://www.gov.ie/en/department-of-justice-home-affairs-and-migration/press-releases/ministers-mcentee-and-burke-welcome-agreement-on-actions-to-increase-the-competitiveness-of-ireland-in-attracting-key-skills/

DJHAM (2025). ‘Policy Document on Non-EEA Family Reunification’. Available at: https://assets.gov.ie/static/documents/f88cb36e/Revised_Family_Reunification_Policy.pdf

DJHAM (2026a). ‘Atypical Working Scheme’. Available at: https://www.irishimmigration.ie/coming-to-work-in-ireland/what-are-my-work-visa-options/applying-for-a-long-stay-employment-visa/atypical-working-scheme/

DJHAM (2026b). ‘Immigration permission/stamps’. Available at: https://www.irishimmigration.ie/registering-your-immigration-permission/information-on-registering/immigration-permission-stamps/

Doorley, K., O’Connor, S., O’Shea, R. and Tuda, D. (2026). *Artificial Intelligence and income inequality in Ireland*. Economic and Social Research Institute and Department of Finance. *Jointly-published report No. 16*. https://doi.org/10.26504/jr16

EGFSN (2024a). *Skills for Modern Methods of Construction. An Assessment of the Current and Future Skills Requirements for the Transition to Modern Methods of Construction*. Available at: https://www.skillsireland.ie/media/bjqdgjq0/mmc-report-final.pdf

EGFSN (2024b). 'Skills for International Financial Services. An Assessment of the Future Skills Requirements in High Potential Sub-Sectors of Ireland's International Financial Services Sector to 2027'. Available at: https://www.skillsireland.ie/media/vdwbgwmr/egfsn-skills-for-international-financial-services-2024.pdf

EGFSN (2024c). 'Skills for biopharma. Researching and Forecasting the Current and Future Skills Needs of the Biopharma Sector in Ireland to 2027'. Available at: https://www.skillsireland.ie/media/x4xbx2z2/egfsn-skills-for-biopharma-2024_.pdf

EGFSN (2026). 'Members'. Expert Group on Future Skills Needs. Available at: https://www.skillsireland.ie/about-us/egfsn-members

EMN (2020a). *Attracting and protection rights of seasonal workers in the EU and United Kingdom*. Synthesis Report for the EMN Study. Available at: https://emn.ie/wp-content/uploads/2020/12/2020_eu_seasonal_workers_study_synthesis_report_en.pdf

EMN (2020b). *EU labour migration policy: time to move from a skill-based to a sector-based framework?* EMN – JRC – DG Home Roundtable. Briefing paper. Available at: https://emn.ie/wp-content/uploads/2021/01/00_labour_migration_roundtable_briefing_paper.pdf

EMN (2025). *Labour migration in times of labour shortages: EMN-OECD joint study*. Available at: https://emn.ie/publications/labour-migration-joint-study/

EMN (forthcoming). *Staying or moving on? Drivers and policies to retain global talent*.

EMN (n.d.). *Immigration Quota*. EMN Glossary. Available at: https://home-affairs.ec.europa.eu/networks/european-migration-network-emn/emn-asylum-and-migration-glossary/glossary/immigration-quota_en

European Bank for Reconstruction and Development (2024). 'Transition Report 2023-24', Chapter 3. Available at: https://www.ebrd.com/news/publications/transition-report/transition-report-202324.html

European Commission (2023). 'COM(2023) 577 final: Demographic change in Europe: a toolbox for action'. Available at: https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52023DC0577

European Commission (2025). 'EU Talent Pool'. Available at: https://home-affairs.ec.europa.eu/policies/migration-and-asylum/legal-migration-and-resettlement/work/eu-talent-pool_en

Eurostat (2025). 'Employment and activity by sex and age - annual data'. Available at: https://ec.europa.eu/eurostat/databrowser/view/lfsi_emp_a__custom_19873224/default/table

Eurostat (2026a). 'Euro area unemployment at 6.4%'. Available at: https://ec.europa.eu/eurostat/web/products-euro-indicators/w/3-02122025-bp

Eurostat (2026b). 'Job vacancy and unemployment rates – Beveridge curve'. Available at: https://ec.europa.eu/eurostat/statistics-explained/SEPDF/cache/34209.pdf

Eurostat (2026c). 'Job vacancy statistics'. Available at: https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Job_vacancy_statistics

Government of Ireland (2018). *Review of economic migration policy: Report of the Inter-Departmental Group*. Available at: www.enterprise.gov.ie

Government of Ireland (2024). 'Review of the Proposed Roadmap for Increasing Minimum Annual Remuneration Thresholds for Employment Permits – survey information'. Available at: https://www.gov.ie/pdf/?file=https://assets.gov.ie/314362/4666060d-e9bc-4569-b1db-6e65e5a56a3d.pdf#page=null

Gusciute, E., Quinn, E. and Barrett, A. (2015). *Determining Labour and Skills Shortages and the Need for Labour Migration in Ireland*. ESRI Research Series Number 49.

Heffron, M. and Socha-Dietrich, K. (2019). 'The Irish paradox: Doctor shortages despite high numbers of domestic and foreign medical graduates', in: OECD (2019). *Recent Trends in International Migration of Doctors, Nurses and Medical Students*. OECD Publishing, Paris, https://doi.org/10.1787/5571ef48-en

Houses of the Oireachtas (4 July 2017). 'Joint Committee on Jobs, Enterprise and Innovation debate: Atypical Work Permit Scheme: Discussion'. www.oireachtas.ie/

Houses of the Oireachtas (7 February 2018). 'Dáil Éireann debate, Wednesday 7 February 2018'. https://www.oireachtas.ie/en/debates/

Houses of the Oireachtas (17 June 2021). 'Dáil Éireann debate: Fisheries and Coastal Communities: Statements'. www.oireachtas.ie/

Houses of the Oireachtas (20 October 2021). 'Joint Committee on Enterprise, Trade and Employment debate: Resourcing and capacity of the Workplace Relations Commission Discussion'. https://www.oireachtas.ie/en/debates/

Houses of the Oireachtas (19 June 2024). 'Dáil Éireann debate: Employment Permits Bill 2022: From the Seanad'. Available at: https://www.oireachtas.ie/en/debates/debate/dail/2024-06-19/22/

Houses of the Oireachtas (28 February 2024). 'EU Talent Pool: Motion'. Available at: https://www.oireachtas.ie/en/debates/debate/dail/2024-02-28/18/#:~:text=Talent%20partnerships%20are%20a%20series,what%20we%20need%20in%20Ireland

ICMPD (2024). 'SUSTAIN Europe: Scaling Up STEM Talent from Africa in Europe'. Available at: https://www.migrationpartnershipfacility.eu/mpf-projects/71-sustain-europe-scaling-up-stem-talent-from-africa-in-europe/preview

Joint Committee on Business, Enterprise and Innovation (2017). 'The situation of non-EEA crew in the Irish Fishing Fleet under the Atypical Worker Permission Scheme'.

Joyce, C. (2012). *Annual Policy Report on Asylum and Migration 2011: Ireland*. *ESRI and EMN*. Available at: https://emn.ie/publications/annual-policy-report-on-migration-and-asylum-2011-ireland/

KPMG (2024). 'Labour market impacts of health care assistant employment permits'. Department of Enterprise, Trade and Employment. Final report May 2024. Available at: https://enterprise.gov.ie/en/publications/publication-files/report-on-the-labour-market-impact-of-health-care-assistant-employment-permits.pdf

Krings, T., Bobek, A., Moriarty, E., Salamońska, J. and Wickham, J. (2011). 'From boom to bust: Migrant labour and employers in the Irish construction sector', *Economic and Industrial Democracy*, 32(3), 459-476.

Kumar, C. and Donoghue, D. (2024). 'Decarbonising Ireland's housing stock. How immigration can help solve workforce challenges'. ODI Working Paper. Available at: https://media.odi.org/documents/ODI_Decarbonising_Irelands_housing_stock_eNHca1b.pdf

Laurence, J., Kelly, E., McGinnity, F. and Curristan, S. (2023). *Wages and working conditions of non-Irish nationals in Ireland*. ESRI Jointly Published Reports. https://doi.org/10.26504/jr2

Maher, G. and Cawley, M. (2016). 'Short-term labour migration: Brazilian migrants in Ireland', *Population, Space and Place*, 22(1), 23-35.

McGinnity, F., Grotti, R., Groarke, S. and Coughlan, S. (2018). *Ethnicity and nationality in the Irish labour market*. ESRI Research Series. https://doi.org/10.26504/bkmnext369

McGinnity, F., Carron-Kee, E., Alamir, A., Dalton, C., Darmody, M., Hingre, G. Murphy and Quinn, E. (2025). *Monitoring Report on Integration 2024*. https://doi.org/10.26504/JR11

McNaboe, J., Burke, N., Condon, N., Hogan, A., Shally, C. and Walls, D. (2021). 'National Skills Bulletin 2021'. SOLAS. Skills and Labour Market Research Unit. October 2021. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

McNaboe, J., Condon, N., Shally, C., Hogan, A. and Daly, F. (2023). 'National Skills Bulletin 2023'. SOLAS. Skills and Labour Market Research Unit. October 2023. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

McNaboe, J. Condon, N., Daly, F., Hogan, A., Shally, C. and Jakubowska, M. (2025a). 'National Skills Bulletin 2025'. SOLAS. October 2025. Skills and Labour Market Research Unit. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

McNaboe, J. Condon, N., Daly, F., Hogan, A., Shally, C. and Jakubowska, M. (2025b). 'Section 10: Occupational Employment Profiles', in: *National Skills Bulletin 2025*. SOLAS, Skills and Labour Market Research Unit. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

MRCI (2017). 'Left High and Dry: The Exploitation of Migrant Workers in the Irish Fishing Industry'. Available at: www.mrci.ie

MRCI (2020). 'Working to the bone: The experiences of migrant workers in the meat sector in Ireland'. Available at: https://www.mrci.ie/2020/11/30/working-to-the-bone/

MRCI (2026). 'Tied to exploitation: the experience of migrant workers in Ireland'. Migrant Rights Centre Ireland. Available at: https://www.mrci.ie/app/uploads/2026/03/Tied-to-Exploitation.pdf

Murphy, C., Doyle, D.M. and Murphy, M. (2020). '"Still waiting" for justice: Migrant workers' perspectives on labour exploitation in Ireland', *Industrial Law Journal*, 49(3), 318-351.

Murphy, K. and Sheridan, A. (2022). *Annual Report on Migration and Asylum 2021: Ireland*. Available at: https://emn.ie/publications/arm-2021-ireland/

Murphy, K. and Sheridan, A. (2023). *Annual Report on Migration and Asylum 2022: Ireland*. Available at: https://emn.ie/publications/annual-report-on-migration-and-asylum-2022-ireland/

Murphy, K., Mitchell, A., Rohan, L., Dalton, C. and Hahn, A.S. (2025). *Asylum and Migration Overview 2024: Ireland*. ESRI Survey and Statistical Report Series No. 137. Available at: https://emn.ie/publications/asylum-and-migration-overview-2024-ireland/

O'Sullivan, S. and Murphy, C. (2022). 'The 'special structural vulnerability' within migrant agricultural work', *Irish Jurist*, 68, p. 50-72.

OECD (2018). 'Skills for Jobs database'. OECD Publishing, Paris Available at: https://www.oecdskillsforjobsdatabase.org/data/Skills%20SfJ_PDF%20for%20WEBSITE%20final.pdf

OECD (2024a). *OECD Economic Outlook*, Vol. 2024 Issue 2, No. 116, OECD Publishing, Paris. Available at: https://doi.org/10.1787/d8814e8b-en

OECD (2024b). 'Understanding Labour Shortages: The structural forces at play', *OECD Economic Outlook* Vol. 2024 Issue 2, OECD Publishing, Paris, pp.59-96. Available at: https://www.oecd.org/en/publications/oecd-economic-outlook-volume-2024-issue-2_d8814e8b-en/full-report.html

OECD (2025). 'OECD Economic Surveys: Ireland 2025'. ECD Publishing, Paris, https://doi.org/10.1787/9a368560-en

Polakowski, M. and Cunniffe, E. (2023). *Labour Market Integration of International Protection Applicants in Ireland*. ESRI Research Series Number 150. https://doi.org/10.26504/rs160

Potter, D., Murphy, K., Sheridan, A. and de Barra, Y. (2025). *Annual Report on Migration and Asylum 2023: Ireland*. Available at: https://emn.ie/publications/annual-report-on-migration-and-asylum-2023-ireland/

Privalko, I., McGinnity, F., Curristan, S. and Enright, S. (2025). 'How do migrants fare in the Irish Labor Market? Country of origin, gender, asylum and ethnicity effects', *Journal of Immigrant & Refugee Studies*. Vol. 23, No. 2, 268-291.

Publications Office of the European Union (2024), 'Employment and Social Developments in Europe 2023'. Available at: https://op.europa.eu/webpub/empl/esde-2023/

Quinn, E. (2010). *Satisfying labour demand through migration: Ireland*. European Migration Network. Economic and Social Research Institute, Dublin, Ireland.

Robin-Olivier, S. (2016). 'The Community Preference Principle in Labour Migration Policy in the European Union', OECD Social, Employment and Migration Working Papers, No. 182. OECD Publishing, Paris. Available at: http://dx.doi.org/10.1787/5jlwxbzcfsq6-en

Roche, E., O'Donnell, S. and Richardson, N. (2025). 'Factors influencing the mental health help-seeking behaviours of construction workers in Ireland: perspectives from managers', *Health Promotion International*, *40*(6). https://doi.org/ 10.1093/heapro/daaf210

Ruhs, M. (2005). 'Managing the Immigration and Employment of non-EU Nationals in Ireland', *Studies in Public Policy: 19*. The Policy Institute, Trinity College Dublin, Dublin.

Ruhs, M. (2013). *The price of rights. Regulating International Labor Migration*. Princeton University Press. doi.org/10.23943/princeton/9780691132914.001.0001

Ruhs, M. and Anderson, B. (2010). *Who needs migrant workers? Labour shortages, immigration, and public policy*. Oxford University Press.

SLMRU (2023). *Summer Skills Bulletin 2023: Using Cedefop forecasts (2021-2035) to inform future demand for skills in Ireland*. Available at: https://a.storyblok.com/f/70398/x/1de1088fcb/summer-skills-bulletin.pdf

SLMRU (2024). 'Summer Skills Bulletin 2024: Occupational gender segregation in Ireland: unlocking labour supply to meet key skills needs'. Available at: https://a.storyblok.com/f/70398/x/3070efff73/solas_summer-skills-bulletin_2024_.pdf

SLMRU (2025a). 'Difficult-to-fill vacancies survey', Skills and Labour Market Research Unit (SLMRU), SOLAS. November 2025. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

SLMRU (2025b). 'Winter Skills Bulletin 2025: Older workers in Ireland labour market perspective'. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

SLMRU (2025c). 'Summer Skills Bulletin 2025: Prevalence of Skills Mismatch in Ireland's Labour Market'. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

SLMRU (2025d). 'Spring Skills Bulletin 2025: Is Ireland Truly Green? Measuring Green Jobs and Skills in the Irish Labour Market'. Available at:

https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

SOLAS (2026). 'Skills and Labour Market Research, SLMRU – Research'. Available at: https://www.solas.ie/research-lp/skills-labour-market-research-slmru/research/

Stapleton, A., Cunniffe, E. and Quinn, E. (2024). *Non-EU nationals in irregular employment in Ireland*. ESRI Research Series No. 189. https://doi.org/10.26504/rs189

Sweeney, L., O'Donnell, S., White, P.J., Caroll, P., Harrison, M. and Richardson, N. (2026). 'Cross-sectional study exploring the prevalence and associated risk factors for suicidality among apprentices in the Irish construction industry', *BMJ Public Health*, 4(2). doi:10.1136/bmjph-2025-004497

US Department of State (2017). '2017 Trafficking in Persons Report: Ireland'. Available at: https://www.state.gov/reports/2017-trafficking-in-persons-report/ireland/

WRC (2024). *Annual Report 2024*. Workplace Relations Commission. Available at: https://www.workplacerelations.ie/en/publications_forms/corporate_matters/annual_reports_reviews/annual-report-2024.pdf

WRC (Workplace Relations Commission) (2025). *Annual Report 2025*. Available at: https://www.workplacerelations.ie/en/publications_forms/corporate_matters/annual_reports_reviews/annual-report-2025.pdf



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