
Public Consultation on the Development of the Department's Statement of Strategy 2025-2028

Submission from American Chamber of Commerce
Ireland (AmCham) to the Department of Enterprise,
Trade and Employment (DETE)

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The American Chamber of Commerce Ireland

The Voice of US-Ireland Business

The American Chamber of Commerce Ireland (AmCham) is the collective voice of US companies in Ireland and the leading international business organisation supporting the Transatlantic business relationship. Our members are the Irish operations of all the major US companies in every sector present here, Irish companies with operations in the United States and organisations with close linkages to US-Ireland trade and investment.

The American Chamber of Commerce Ireland (AmCham) welcomes the opportunity to make a submission to the Department of Enterprise, Trade and Employment's consultation on the development of its Statement of Strategy for 2025-2028.

Goal 1: Sustain full employment and strong regional economic development

Ireland's strong employment rates and economic performance in recent years have been underpinned by consistent, pro-enterprise policymaking and it is essential that this focus continues to maintain Ireland's global competitiveness. Ensuring Ireland remains an attractive location for talent to live and work is also key in supporting future business growth and investment. In this context, talent attraction and skills shortages have consistently ranked amongst the top challenges Ireland must address according to AmCham member surveys. In sustaining full employment, and ensuring Ireland attracts key talent and retains its highly educated and skilled talent pool, key challenges will need to be addressed across infrastructure, housing, planning, and balanced regional development, which will also support the delivery of balanced regional growth.

Balanced Regional Development

Regional Ireland plays a critical role in the national economy, contributing significantly to investment, employment, and enterprise activity across the country. In 2024, there were 474 US operations located in Ireland's regions, directly employing 119,000 people and supporting a further 95,000 jobs across regional communities. In 2023, US multinationals contributed €24.1 billion to regional economies through payroll, goods, services, and capital expenditure. To continue to attract and retain FDI in the regions, a coordinated, all-of-government approach is needed to deliver the infrastructure and services that make regional locations attractive for investment and talent. Progress in areas such as transport, healthcare, education, and housing will be essential to ensure continued growth and opportunity. Continued support for regional enterprise strategies will help unlock the full potential of communities across the country and further embed Ireland's position as a destination of choice for globally mobile investment.

Ireland's sectoral clusters continue to be a key strength of Ireland's economy, fostering innovation, strengthening regional economies, and encouraging collaboration across industry and academia. The Department should continue its commitment to advancing clustering policy as a driver of regional competitiveness and national growth.

Clustering creates the conditions for shared innovation, talent retention, and enterprise resilience. Ongoing support for these ecosystems will help to reinforce Ireland's attractiveness as a global investment location while driving inclusive economic growth in every region and supporting indigenous innovation.

R&D Investment

Ireland's ability to attract global R&D investment is critical to its innovation economy. AmCham encourages the Department to champion competitive, forward-looking R&D policies and incentives that support high-value investment from global companies. Measures to support an increasing the number of PhD graduates and strengthening the pool of researchers in each sector would support Ireland as a location in which to place R&D investment. These investments not only generate skilled employment but also contribute to knowledge transfer and strengthen the wider research ecosystem in Ireland. To remain globally competitive, Ireland's R&D offering must evolve with business needs and be agile to international competition.

The Department should work with the Department of Finance to make enhancements to the R&D tax credit. For example, where the Irish entity is the principal intellectual property (IP) owner and bears the associated economic risk, consideration should be given to allowing the related party expenditure to be included in qualifying spend. Expanding the definition of qualifying expenditure in this way would reflect the realities of modern R&D structures and strengthen Ireland's position as a location for high-value innovation activity. In addition, revising or removing the current limits on outsourcing within the R&D tax credit framework would encourage greater collaboration between multinational and indigenous companies, helping to deepen links across the R&D ecosystem and maximise the economic impact of R&D investment in Ireland.

In line with the commitment under the Programme for Government, the Government's aim to "*reward innovation and digitalisation and ensure Ireland has the global best in class incentive to encourage innovation by domestic and international companies*" is positive. The Department should work with the Department of Finance to introduce a new digitalisation tax credit that supports businesses in adopting transformative digital technologies, such as AI, automation, and cloud solutions, to boost productivity and competitiveness. In addition, a dedicated sustainability tax credit should be developed to incentivise business investment in green technologies, energy efficiency, and decarbonisation initiatives. Together, these incentives would strengthen Ireland's attractiveness as a location for forward-looking, innovation-driven investment and support the delivery of national climate and digitalisation goals.

National Development Plan

The timely delivery of core infrastructure projects is critical to sustaining enterprise growth and maintaining Ireland's competitiveness as a destination for investment. The Department should aim to work in close partnership with the Department of Public Expenditure, National Development Plan Delivery and Reform to ensure that key elements of the National Development Plan (NDP) are delivered at pace and aligned with business needs.

Strategic infrastructure, particularly in transport and digital connectivity, must be prioritised to support economic activity across all regions. Strengthened regional and intercity transport links will improve talent mobility and enhance supply chain resilience. Similarly, the accelerated rollout of the National Broadband Plan is essential to equipping every region with the digital infrastructure required to thrive in a modern economy. Coordinated, cross-departmental delivery of the NDP will be essential to meeting Ireland's economic and regional development goals.

Housing

Access to housing is one of the most pressing challenges facing international employers in Ireland. In AmCham's most recent FDI Insights survey, members identified housing as the infrastructure area in most urgent need of government attention. The Department should work closely with the Department of Housing, Local Government and Heritage to advance innovative and scalable housing delivery models. Promoting the adoption of modern methods of construction, leveraging international best practices, and ensuring alignment with essential services such as transport, healthcare, and education will be critical to making Ireland a competitive and attractive place to live and work.

Planning

A timely, and well-resourced planning system is fundamental to Ireland's competitiveness. The recent Planning and Development Act represents progress in this regard. The Department should continue to work with other relevant Departments to increase the pace of infrastructure delivery and enterprise expansion. Businesses require certainty of process and clear consistent timelines for planning decisions to be made, not certainty of outcome, to support investment and growth. The Department should continue to advocate for increased planning capacity, expedited timelines for consideration of strategic infrastructure projects, and the digitalisation of planning systems. These steps will enable faster delivery of projects critical to investment and growth and provide certainty of timeframe which will, in turn, support business growth

and investment into the future. Further, they would support Ireland in addressing its infrastructural deficit to remain attractive for inward investment, including in housing, energy, water and wastewater, transport, and regional development.

Goal 2: Advance the low carbon and digital transitions to ensure the competitiveness and sustainability of Irish based enterprise

AmCham supports the Department's commitment to advancing the green and digital transitions. These twin priorities are fundamental to maintaining Ireland's competitiveness, achieving long-term sustainability, and securing continued FDI.

Sustainability

Ireland's pathway to a low-carbon future presents significant opportunities for innovation, enterprise growth, and global leadership. The Department plays a crucial role in enabling enterprise to engage with, and benefit from, this transition. AmCham recommends that the Department continue to work closely with business to promote awareness of renewable energy opportunities and support the design of policies that allow companies to decarbonise at scale. Supporting industry in planning for the future, with certainty, will be essential to delivering on climate goals while ensuring Ireland remains a competitive location for inward investment.

The Department also has a valuable role to play in encouraging the uptake of renewable energy by engaging with the Department of the Environment, Climate and Communications to ensure that business needs are reflected in energy policy. Supporting measures such as corporate power purchase agreements and fostering innovation in emerging technologies, including green hydrogen, solar, offshore wind, and wave energy, will be essential to positioning Ireland as a leader in the low-carbon economy.

Digitalisation and the Innovation

The Department should continue to advance digitalisation as a core pillar of Ireland's sustainable economic growth. The digital transition presents a significant opportunity to boost productivity, streamline regulatory and administrative processes, and enhance the delivery of public services. As committed to under the Programme for Government, the development of a new national Digital Strategy provides a timely opportunity to embed digital transformation across government and enterprise. AmCham encourages the Department to lead in ensuring that this strategy is designed in close consultation with business, and that it reflects the evolving needs of business. A strong focus on

implementation, backed by clear metrics and sustained investment, will be essential to maximising its impact.

To ensure regulators are prepared for an evolving digital landscape, AmCham recommends that the strategy include commitments to ensuring all relevant regulatory bodies, are adequately resourced, staffed with technically proficient personnel, and equipped to interpret and implement digital and technology regulation effectively.

Cybersecurity

The resilience of Ireland's digital infrastructure is fundamental to maintaining its reputation as a trusted global hub for technology and business. As cyber threats continue to grow in scale and sophistication, the Department's strategy should reflect the rising reputational and financial risks posed by cyber-attacks. The Government's commitment under the Programme for Government to delivering an updated National Cyber Security Strategy is welcome and the Department should play an active role in its development and implementation. Strategic investment in protecting critical infrastructure is essential to ensuring that cybersecurity readiness is embedded across all sectors of society. Strengthening the national capacity to prevent, detect, and respond to cyber incidents will be vital in safeguarding Ireland's competitiveness and investor confidence.

Goal 3: Deepen and extend Ireland's global business and trade in a responsible, fair and sustainable manner

Ireland's continued success as a globally connected economy is closely tied to its ability to champion open markets, deepen international partnerships, and strengthen its role as a trusted location for global business. Therefore, expanding Ireland's global trade footprint in a way that supports sustainable growth and international collaboration should be a key priority.

All-Island Economy

The all-island economy remains a key component of Ireland's value proposition for FDI. The Department should continue to focus on enhancing cross-border connectivity, reducing administrative barriers, and facilitating greater collaboration between businesses and institutions on both sides of the border. Strategic investment in infrastructure and business supports in these regions will help to attract further FDI to the North-West and border regions.

International Trade

Ireland's strong trade relationship with the United States is a cornerstone of its economic model. Therefore, maintaining and deepening transatlantic trade ties must remain a top priority. This includes supporting efforts at EU and multilateral level to strengthen US-EU regulatory cooperation.

As the global trade landscape evolves, Ireland must also remain a vocal advocate for international engagement and openness. The Department should continue its work with EU and international partners to shape fair, balanced trade agreements and regulatory frameworks that support innovation and enterprise growth. In doing so, Ireland can ensure that it remains a stable and attractive base for globally focused companies.

Goal 4: Improve our business regulatory environment to enhance Ireland's attractiveness as a place to do business

A predictable, consistent, and innovation-friendly regulatory environment is essential to Ireland's continued success as a global hub for business. The Department should aim to improve the regulatory landscape in a way that enhances certainty, supports investment, and reflects the realities of a rapidly evolving digital economy.

Digital Regulatory Hub

Ireland's standing as a leading digital regulatory hub within the EU is a key part of its global value proposition. This position must be safeguarded and enhanced by a commitment to high-quality, consistent, and proportionate regulation. Central to this is upholding the country-of-origin principle, which ensures that companies operating across EU borders are regulated by the authorities of the country in which they are headquartered. For the many global digital companies based in Ireland, this principle offers regulatory certainty and streamlines compliance.

As regulatory demands grow more complex, particularly in digital, data, and AI, there is a growing need for Ireland to lead on the development of balanced EU-level frameworks that protect rights while supporting innovation. Ireland must continue to be an influential voice at the European table, advocating for proportionate, risk-based approaches to emerging regulatory challenges.

To maintain and grow Ireland's reputation as a best-in-class regulator, the capacity of Ireland's regulatory bodies must keep pace with the increasing complexity of digital oversight. Continued investment in ensuring that regulators are appropriately staffed, resourced, and equipped with the technical expertise required to oversee areas such

as data governance, AI, cybersecurity, and digital services will be key in supporting Ireland's position as a regulatory hub.

All regulators will require enhanced digital and cyber capabilities as business and public services become increasingly digitalised. A cross-government approach to building regulatory digital skills and infrastructure will be key in this context.

Goal 5: Promote safety in the workplace, quality employment and uphold employment rights

Visa and Permits

Ireland's visa and permits system serves as a crucial first point of contact for international talent and their families. A smooth, transparent, and timely process not only supports individual relocation but also reinforces Ireland's overall attractiveness as a destination for investment and skilled professionals.

The prioritisation of the continued digitalisation and modernisation of the visa and permits system will be key in supporting Ireland's attractiveness for international talent. Streamlining the application process and improving the clarity and consistency of decision-making timeframes would significantly enhance the user experience for employers and employees alike.

A commitment to developing a 'one-stop-shop' model, informed by international best practice, would provide much-needed efficiency and predictability. This would support the ability of businesses to attract and retain talent in a globally competitive environment, while also reflecting Ireland's commitment to being an open and welcoming place to live and work.

Goal 6: Build an innovative, inclusive and agile Department with a strong public service ethos driving effective and responsible policy implementation.

Stakeholder Engagement

Effective and ongoing stakeholder engagement should remain a central pillar of the Department's strategy. Meaningful collaboration with industry is essential to developing a well-rounded understanding of the challenges and opportunities facing the business community and to ensuring that Ireland remains an attractive and competitive location for investment.

AmCham recognises the role of existing Department-led platforms which facilitate open dialogue and bring diverse business perspectives to the table. Continued support for, and expansion of, these forums will help ensure that policymaking remains informed and responsive to the evolving needs of businesses.