

Ireland's Immigration Pathways

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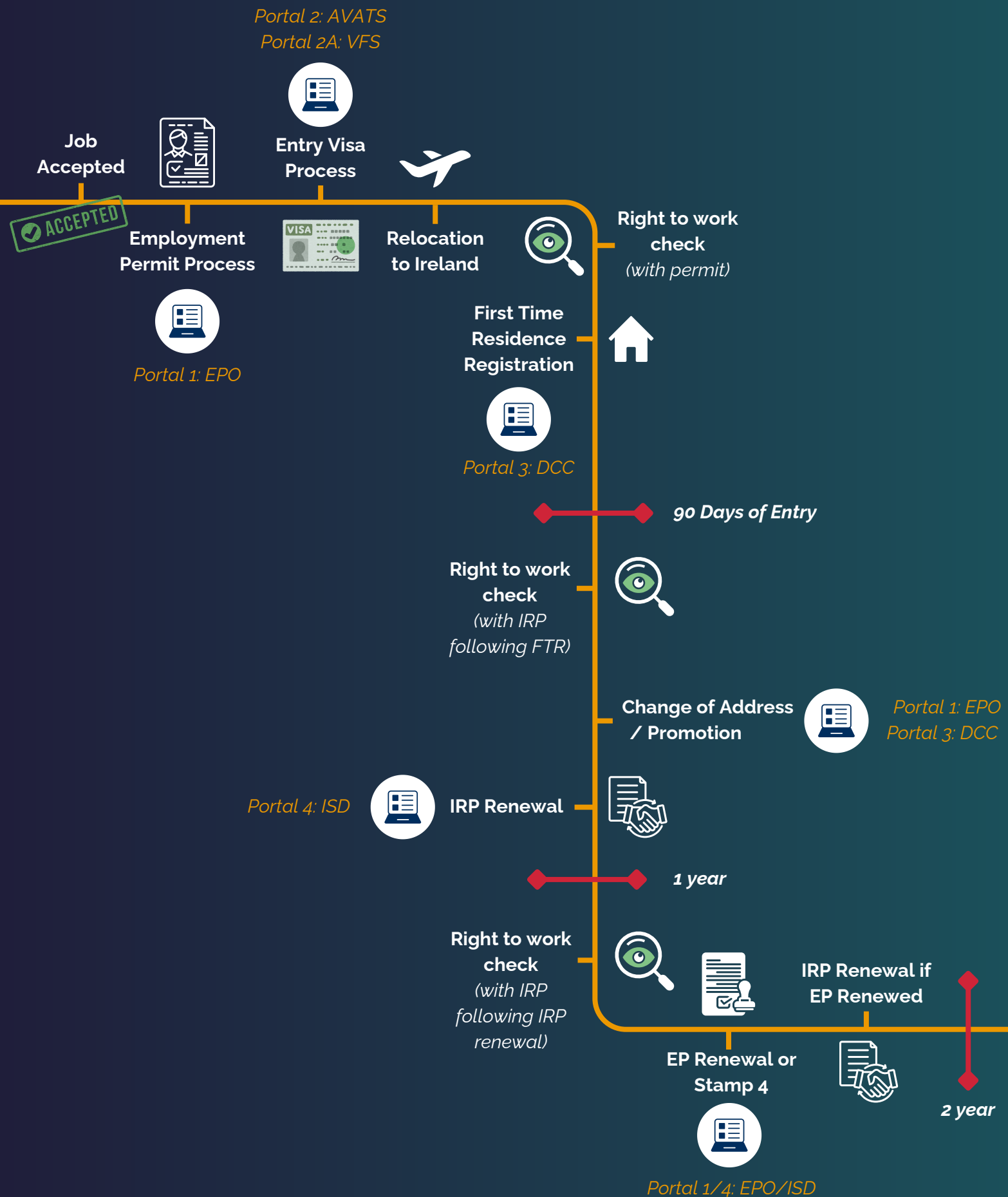
The Voice of US-Ireland Business

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.

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The Current Immigration Pathway



Key Recommendations:

Streamlining the Business Migration System:

- Support the development of a faster, streamlined migration system in Ireland with in-built interim measures.
- Expand roles eligible for Employment Permits and continue to review and expand the Critical Skills Occupations List in a timely and reactive manner.
- Prioritise the continued development of a future-focused, skills-based migration system that addresses skill gaps and shortages.
- Develop coordinated mechanisms through which industry stakeholders can regularly engage with relevant Government Departments and relevant agencies regarding implementation of changes to the migration system.
- Implement a unified permit that combines an Irish Residence Permit (IRP), Employment Permit, and Entry Visa where the duration of residency aligns with the Employment Permit duration and, while this is being considered and developed, grant IRP cards for a minimum period of 3 years, to reduce the administrative and cost burden of annual IRP card renewals.
- Develop and implement a single migration application process.

Digitalisation of Services:

- The development of a digital one-stop-shop for the migration process, from a DoJ perspective, to include consolidating the existing migration portals.
- Facilitate the ability for agents to access all portals on behalf of employers and employees, through the issuance of consent forms, and to include professional services firms, to harness the full expertise of the business community.
- That the IRP card (or succeeding unified documentation) is made available in digital format.
- Cross-Departmental-industry cooperation regarding testing of digitalised processes prior to the launch of services.
- To facilitate the inclusion of migration as part of the Digitalisation of Life Events.

Employment Permits Online (EPO):

- That sufficient time, determined by cooperation with industry, be given for the testing of new systems prior to launch.
- To address concerns over the role of agent access in relation to the operation of the EPO portal.
- Barriers to practical use of the EPO portal for employers, employees, and agents, be addressed as a matter of urgency and that consultation be sought with key stakeholders.

Coordinating Government-Industry Strategy:

- The establishment of a Business Immigration Unit within the DoJ.
- Greater cross-Departmental-industry cooperation, with industry forums, to strengthen future capacity for investment.
- Comprehensive and continuously updated public policy guidance around areas such as right to work checks and the impact of absences from Ireland.

Trusted-Entity Self-Certification:

- Government-industry engagement on the development of a 'Trusted-Entity' scheme.
- Introduce a 'Trusted-Entity Self-Certification' scheme to alleviate processing times and increase talent acquisition efficiency.
- Develop a cross-Departmental ability to formally register business critical projects with the authorities to ensure consistent processing of Employment Permits and Entry Visas.

Improving Visa Processing and Entry Mechanisms:

- The development and implementation of an expedited Business and Employment Visa service for high demand sectors as a matter of priority and, in the longer term, rolling this out generally so that Ireland aligns with other countries in terms of having a Visa expedite service.
- Continued focus on reducing current Business and Employment Visa processing times through increased investment and resourcing pending any expedited Visa service being introduced.
- Develop universal Visa application requirements and processes across all global locations for all Irish Visa types including document requirements.
- Develop mechanisms to facilitate the entry of specialised individuals as part of defined projects.
- Ensure that entry stamps are provided correctly to remove any issues with registration, with an additional mechanism to amend incorrect entry stamps.

Linking Education & Migration Pathways:

- The continued development of future-focused policies to facilitate the transition of individuals on student Visas to a more defined pathway to work, with a particular focus on reducing the remuneration thresholds, or defined exemptions for Employment Permits for graduates.
- Develop industry-academia partnerships to ensure growth in research, development and innovation.
- Increase the number of engagements for Government-industry dialogue to develop growth and identify emerging skills gaps.

Enhancing Family Reunification:

- Ensuring that spouses and familial Visa applications are processed in a timely manner through additional investment and resourcing.
- To address delays in preclearance and its effect on the migration system and the attractiveness of Ireland, as a migration destination.

Foreword

As of 2024, Ireland is home to 973 US companies with operations in the State. These companies employ 211,000 workers directly, with a further 169,000 people in employment through indirect means. In 2023, these companies spent a cumulative €40.7 billion on payroll, capital expenditure, goods, and services. These figures underscore the importance of US Foreign Direct Investment (FDI) in Ireland, and the need for continued policy implementation that fosters growth and expansion.

A recent AmCham survey of members demonstrated that 9 in 10 of respondents said that their corporate headquarters held a positive view of Ireland as a location for investment and growth, based on their experiences of the last year in Ireland. In the same survey, 63% of respondents said that access to Ireland's highly educated and skilled talent pool was Ireland's strongest competitive advantage, however, 64% said they were currently experiencing a skills gap in Ireland.

Ireland's ability to attract and retain international talent plays a key role in continuing inward investment to the economy and facilitating future expansion of business operations in Ireland. Reducing barriers to international talent accessing Ireland is a pivotal goal in developing a framework to facilitate that growth and create a skilled talent pathway to Ireland.

While there has been positive progress in several areas in the business-migration system in recent years, a continued focus by Government on streamlining services will be an important factor in delivering a modern, efficient and accessible system that provides certainty for employees and employers alike.

This White Paper sets out the key challenges facing the business community in Ireland and proposes solutions that will enhance Ireland's ability to strengthen its skilled talent pool and drive new opportunities for FDI in Ireland, regarding Ireland's current business immigration pathways.



Streamlining the Business Migration System

It is vital for Ireland's continued growth and competitiveness that companies based in Ireland have access to the best international talent. Current delays in the Irish migration system, driven by complexity of processes, are resulting in assignments being cancelled, key project deadlines being missed, and companies choosing to expand operations in other jurisdictions rather than in Ireland, thereby undermining the positive progress made in other streamlined areas of the migration system. It is important to address these issues to protect Ireland's position as the destination of choice for FDI and growth.

Currently, workers accepting a job in Ireland from abroad must undergo a complex system of multiple applications and approvals, under several Government Departments, to begin their work in Ireland. By reducing the administrative burden and streamlining the migration process, while maintaining the highest standards of compliance and best-practice, Ireland can harness greater levels of international talent.

The commitments made within the Programme for Government 2025 to develop a migration system that supports fast and streamlined processing, as well as prioritising a skill-based migration system to target sectors, and the expansion of eligible roles for Employment Permits, are welcome developments. It is important that timelines for such changes are clearly defined and that implementation reviews are undertaken and feedback from industry is sought as part of wider stakeholder engagement, in a coordinated manner across Government Departments.

Clarity and certainty within the migration process is of critical importance for companies to forecast employment growth, plan investment, and implement expansion plans. By improving Ireland's migration system, companies can enhance their ability to forecast future investment in Ireland.

Developing a simplified process that unifies the IRP card with Employment Permit, and Entry Visa where necessary, as in the Netherlands and Germany; removes the need for multiple 'right to work' checks; provides for a single application process (inclusive of Entry Visa); and provides clear timelines for application processing; would significantly improve the individual/employer experience, ease access to service and promote efficiency through reducing talent acquisition bottlenecks.

AmCham recommends:

- Support the development of a faster, streamlined migration system in Ireland, with in-built interim measures.
- Expand roles eligible for Employment Permits and continue to review and expand the Critical Skills Occupations List in a timely and reactive manner.
- Consult on the areas of professional qualifications vs technical skills and how we can attract talent with technical skills into the labour market.
- A wider strategic review with company engagement to assess what skills Ireland needs (sustainability, A.I etc.) followed by a strategy on how to attract this talent to Ireland e.g. bilateral agreements; or SMPs.
- Prioritise the continued development of a future-focused, skills-based migration system that addresses skill gaps and shortages.
- Provide clear timelines for implementation of the Programme for Government commitments.
- Develop coordinated mechanisms through which industry stakeholders can regularly engage with relevant Government Departments and relevant agencies regarding implementation of changes to the migration system.
- Implement a unified permit that combines an IRP card, Employment Permit, and Entry Visa, where the duration of residency aligns with the Employment Permit duration and, while this is being considered and developed, grant IRP cards for a minimum period of 3 years, to reduce the administrative and cost burden of annual IRP card renewals.
- Develop and implement a single migration application process.
- Provide clear and reliable timelines for processing applications and appeals.

Digitalisation of Services

Digitalisation of migration services presents opportunities to enhance Ireland's migration system and modernise processes into a streamlined, efficient, and navigable service, benefiting applicants, employers, and the State.

The development and rollout of a digital 'one-stop-shop' for the migration process would be a transformative initiative that would significantly enhance the user experience and provide for clarity of process, guidance on compliance, and real-time application tracking. The 'one-stop-shop' approach has been implemented in other areas of Government policy with demonstrated success. By replicating this approach in the migration system, the need for numerous existing migration portals would be reduced and significant delays would be averted.

Building on the successful roll out of the digitalised Employment Permit, further digitalisation on permits such as the IRP card (or any future unified permit), to include access for employers, would prove beneficial to the overall efficiency of the system and provide for quicker access and decision making for employers and employees.

In line with Government policy to enhance the digitalisation of public services and to increase integration of digital services across Government Departments as an alternative access channel for users, AmCham is of the view that migration related milestones should be encompassed in the overarching Digitalisation of Life Events strategy. It is important that as digitalisation is increased, a review of stakeholder access should be implemented to further assist agents supporting immigration programmes, and that future IT systems are API enabled to allow for greater efficiency.

Proactive engagement with the business community is essential regarding the testing of digitalised processes to identify strengths and weaknesses in real-world scenarios, to create a seamless transition to a digitalised system and to foster trust with the business community.



AmCham recommends:

- That digitalisation of the migration system in Ireland be pursued as a matter of priority.
- The development of a digital one-stop-shop for the migration process, from a DoJ perspective, to include consolidating the existing migration portals.
- Facilitate the ability for agents to access all portals on behalf of employers and employees, through the issuance of consent forms, and to include professional services firms, to harness the full expertise of the business community.
- That the IRP card (or succeeding unified documentation) is made available in digital format.
- To facilitate the inclusion of migration as part of the Digitalisation of Life Events.
- Cross-Departmental-industry cooperation regarding testing of digitalised processes prior to the launch of such services.
- Comprehensive and continuously updated public policy guidance around areas such as right to work checks and the impact of absences from Ireland.



Employment Permits Online (EPO)

While the rationale for the introduction of the recently launched Employment Permits Online (EPO) portal is accepted in terms of streamlining and digitalising the Employment Permit process, the development and implementation strategy has given rise to some concerns with regard to the practical use of the EPO system.

The engagement with industry to identify potential issues within EPO, prior to the launch of the portal was a welcome step by the Department of Enterprise, Tourism & Employment (DETE), however, due to the short nature of this consultation process, rigorous testing was not possible. Meaningful engagement with industry stakeholders, including sufficient time to identify issues with practical usage, is vital to the overall success of such portals, and the achievement of their goal to deliver a more seamless application process. Furthermore, this includes the need for rapid action to be taken when feedback is received from organisations involved in the testing of these portals.

Of particular concern regarding the EPO portal, a constrained approach to the role of agents has presented new challenges with the portal. This includes:

- The inability of agents to access employer portals, despite this being a key aspect of their function;
- Agents not being in a position to represent employer and employee and not being able to see what the employee has submitted as part of their application which could potentially result in avoidable refusals of applications and/or delays;
- Actions are now required from the agent, employer, and employee which is a significant change from previous EPOS system, where the agent had responsibility for all aspects, thereby placing an increased burden on employers in particular.

Where the EPO is a vital component in the business migration process, it must address the critical needs of both employers and employees, by developing systems that facilitate easier engagement so that new efficiencies can be driven. Under the EPO, only one email can be used per entity which poses a problem for organisations with multiple entities. Moreover, SMS based authentication, and the requirement for each application to have employer login and signature, including where an agent exists, is resulting in significant administrative burdens for employers and agents managing a high-volume of applications.

AmCham recommends:

- That sufficient time, determined by cooperation with industry, be given for the testing of new systems prior to launch.
- That measurable actions be taken, where necessary, based on the feedback of organisations involved in the testing of systems.
- To address concerns over the role of agent access in relation to the operation of the EPO portal.
- Barriers to practical use of the EPO portal for employers, employees, and agents, be addressed as a matter of urgency and that consultation be sought with key stakeholders.
- That future launches of digitalised systems do not coincide with the retirement of older systems i.e., provide for a transitional overlap while issues are addressed.



Coordinating Government-Industry Strategy

Under Ireland's current migration framework, The Department of Justice, Home Affairs and Migration (DoJ) and DETE, have oversight over various aspects of the migration system. Due to this overlap, it is important that there is strong coordination between the Departments and continued engagement between industry and the Departments to deliver the best outcomes for investment opportunities.

Creating clear channels of communication between industry and the relevant Government Departments will harness the expertise and knowledge of both public and private bodies in identifying policy goals for a solution-based approach.

The establishment of a Business Immigration Unit within Government to liaise with industry, on a regular basis, would be of significant benefit to address key concerns and facilitate a mechanism through which industry can coordinate with Government Departments to mitigate emerging concerns and address challenges.

AmCham recommends:

- The establishment of a Business Immigration Unit within the DoJ.
- Greater cross-Departmental-industry cooperation, with industry forums, to strengthen future capacity for investment.
- Comprehensive and continuously updated public policy guidance around areas such as right to work checks and the impact of absences from Ireland.

Trusted-Entity Self-Certification

The development of a 'Trusted-Entity Self-Certification' scheme would represent a significant step forward in ensuring access to international talent is operated in an efficient manner by reducing administrative burdens and the simplification of the process.

Under such a scheme, pre-approved companies would be permitted to process relevant and necessary applications and checks regarding new employees. These measures would allow for a quicker application timeline, provide more clarity, and strengthen Ireland's competitiveness. Such schemes have been successfully introduced in South Africa and the UK (trusted sponsor), allowing for companies to implement faster talent acquisition mechanisms, reduce skills gaps, and reduce backlogs in the wider migration system.

The ability to move talent quickly is of paramount importance to many MNCs in Ireland. Delays and unpredictability in processing and outcomes, can have a direct impact on an organisation's ability to grow and expand operations and arguably is already having such an impact.

To ensure the highest standards and safeguarding, trusted entities would be subject to Government audit and compliance checks, with possible suspension or removal from the pre-approved trusted-entity list should Government oversight find failures to comply with the relevant laws and regulations. These potential sanctions would provide a significant incentive/deterrent to ensure that the highest standards are implemented across trusted employers.

AmCham recommends:

- Government-industry engagement on the development of a 'Trusted-Entity scheme.
- Develop clear criteria for companies in relation to a 'Trusted-Entity Self-Certification' scheme.
- Introduce a 'Trusted-Entity Self-Certification' scheme to alleviate processing times and increase talent acquisition efficiency.
- Develop a cross-Departmental ability to formally register business critical projects with the authorities to ensure consistent processing of Employment Permits and Entry Visas.

Improving Visa Processing and Entry Mechanisms

Mechanisms by which employees can access the Visa system present opportunities through which significant progress can be made. As it stands, the processing times relating to an Entry Visa in Ireland range from between 4 to 8 weeks. This time frame is significantly longer than those in other jurisdictions, with UK processing times averaging between 5 to 7 days, and Switzerland with an average 7-day processing time.

Building on commitments made in the Programme for Government 2025, to develop and implement an expedited Visa process for professionals in sectors experiencing high demand would be a significant step towards addressing current skills gaps and increasing Ireland's attractiveness for international talent. It is important that the service cost of an expedited, or 'priority' Visa, is developed in a manner that is consistent with the aims of the policy so that it's not unduly prohibitive. Internationally, costs for 'priority' Visas vary significantly with the UK charging £1,420, while Switzerland charges \$100, for such applications.

A focus on reducing the current Business and Employment Visa processing times in Ireland, through continued investment and resourcing, should continue until such time that an expedited system is developed and introduced.

Furthermore, processes for Visa applications often vary depending on the location in which the application is filed. This creates an inconsistency within the system as different documents, support letters, signature requirements, appointment systems, and timelines, are applied in different locations. By providing a universal approach to the Visa application process, greater clarity for employees and employers can be achieved. This can be achieved through embassy directives indicating a consistent approach country by country. To successfully achieve this goal clear case owner guidance will be vital, with the ability for stakeholders to feedback to relevant authorities where challenges are encountered. Measures such as these can improve the overall experience of the system and provide more certainty for the business community and the relevant agents and representatives.

Engaging specialised highly skilled non-EEA national teams to enter Ireland for defined projects is also a challenge for businesses. Unlike other jurisdictions, it is not possible to facilitate a specialised team's entry to Ireland under the category of a defined project and because of delays or perceived delays in Ireland, projects are being re-located to other jurisdictions. This has the potential to impact Ireland's reputation as a place to do business, particularly for project type work.

Further, efforts must be made to address barriers to a non-EEA employee's ability to travel within the EU Schengen region e.g., issues and delays in obtaining Schengen appointments. This poses a challenge particularly for senior talent who are often required to travel for work related matters or business visits to other operations within the EU.

AmCham recommends:

- The development and implementation of an expedited Business and Employment Visa service for high demand sectors as a matter of priority and, in the longer term, rolling this out generally so that Ireland aligns with other countries in terms of having a Visa expedite service.
- That costs of expedited Business and Employment Visas are set in manner consistent with the policy goals.
- Continued focus on reducing current Business and Employment Visa processing times through increased investment and resourcing pending any expedited Visa service being introduced.
- Develop universal Visa application requirements and processes across all global locations for all Irish Visa types including document requirements.
- Develop mechanisms to facilitate the entry of specialised individuals as part of defined projects.
- Ensure that entry stamps are provided correctly to remove any issues with registration, with an additional mechanism to amend incorrect entry stamps.
- Address barriers to Irish resident non-EEA employees travelling within the Schengen region in light of issues with Schengen appointment availability and delays.



Linking Education & Migration Pathways

Data from the Higher Education Authority (HEA), shows that there were approximately 40,400 international students enrolled in Higher Education Institutions in Ireland for the academic year 2023/2024. This is an increase from the approximately 35,140 in the previous academic year, and up from 29,855 international students in the pre-Covid, 2019/2020 academic year. Students from India accounted for the largest cohort of international students in Irish institutions at 17.5%, with the USA in second place at 14%.

Developing future-focused pathways for individuals to transition from Student Visas to being employed in Ireland, particularly in areas of high demand, and including STEM programmes, with regular reviews, can create pathways that link education and academic institutions with industry and, in turn, help ensure a robust and reliable skills and talent pipeline into the future.

In a recent AmCham survey, 100% of respondents said that it was important that there is certainty regarding the availability of highly skilled talent, to maintain FDI employment in Ireland. This underscores the importance of developing pathways to retain knowledge and expertise in Ireland aided through innovations in the migration system.

Further developing industry-academia partnerships and linkages, will boost Ireland's research and innovation output, as well as bridging key gaps in the talent pool. Through Government-industry dialogue and cooperation, these policies can be future proofed to develop sustainable growth and identify emerging gaps.

By linking education and migration policies, Ireland can take necessary steps towards addressing skills shortages, provide greater clarity to investors regarding the future of the talent pool in Ireland, and foster a cross-Departmental approach to delivering policy that assists in the goal of boosting Ireland's competitiveness and attractiveness for inward investment.



AmCham recommends:

- The continued development of future-focused policies to facilitate the transition of individuals on Student Visas to a more defined pathway to work with a particular focus on reducing the remuneration thresholds, or defined exemptions for Employment Permits for graduates.
- Linking education and migration policy to ensure the continued development of Ireland's talent pipeline.
- Develop industry-academia partnerships to ensure growth in research, development and innovation.
- Increase the number of engagements for Government-industry dialogue to develop growth and identify emerging skills gaps.



Enhancing Family Reunification

AmCham is cognisant of the fact that international talent comes from diverse backgrounds and in different stages of life. For many workers, accepting a position in Ireland means not just moving themselves, but also their spouses, partners and dependents.

Delays in processing Visa applications for spouses, partners and dependents of non-EEA nationals already in Ireland causes significant distress and can lead to roles being declined or a failure to retain talent, representing lost opportunity costs to Ireland and the employer. As families operate with different dynamics and require different levels of support, further consideration should be given to expanding eligibility for family Visas, to include parents of the non-EEA national.

A further issue is the need to examine how citizenship applications can be processed in a more timely manner, once an individual meets the required criteria, as citizenship application processing still remains faster in other jurisdictions.

While there have been welcome advancements in this area, including extending the right to work to spouses of recipients of Critical Skills Employment Permits, General Employment Permits and Intra Company Transfer Employment Permits, addressing the delays in familial applications remains an issue that requires continued focus. This is a particular issue in cases where spouses, partners, or significant others, seek to join their family member at a later date (i.e., don't immediately accompany their family member to Ireland), as these cases can take up to 22 months (as of July 2025). Addressing these challenges is an important step to achieving timely familial re-unification processing times.

Furthermore, challenges being encountered with preclearance is leading to growing concern regarding its overall impact on the partners of UK, Irish and EEA nationals. Preclearance applications are taking approximately 12-14 months (as of July 2025). This increasing concern can be mitigated through proactive engagement to reduce undue delays to these processes.

AmCham recommends:

- Ensuring that spouses and familial Visa applications are processed in a timely manner through investment and resourcing.
- To address delays in preclearance and its effect on the migration system and the attractiveness of Ireland, as a migration destination.



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