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Department of Enterprise,
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Summary report of Submissions received in response to Public consultation on National Implementation of EU Harmonised Rules on Artificial Intelligence (AI Act)

Contents

EU Artificial Intelligence Act

The [EU Artificial Intelligence Act (Regulation (EU) 2024/1689 laying down harmonised rules on artificial intelligence](#) is a regulation which provides for a harmonised regulatory framework for AI systems developed or deployed in the EU. It is designed to provide a high level of protection to people's health, safety, and fundamental rights and to promote the adoption of human-centric, trustworthy AI. The EU AI Act entered into force on 1 August 2024 and its provisions will apply, in a phased manner, over the next 36 months.

The AI Act has direct effect in all Member States of the EU. It requires Member States to provide for the supervision and enforcement of the Act at national level. Member States must designate or establish at least one Notifying Authority, and one or more Market Surveillance Authorities (MSA) as National Competent Authorities (NCA) for the Act within 12 months after it enters into force. The obligations on Member States are explicitly set out in the Act. To ensure that the rules are harmonised across the EU, Member States will not have discretion in relation to the interpretation of the provisions applying to AI systems or to the providers or deployers of such systems.

Purpose of consultation

Ahead of the anticipated coming into force of the Act in Autumn 2024, in May 2024 the Department [sought submissions](#) from interested parties on the national implementation of the AI Act to help inform its approach to the design of the appropriate governance structures. The consultation closed on 16 July 2024.

62 submissions were received, from private individuals, industry, industry representative groups, professional services firms, regulators, government bodies, a civil society organisation, trade unions and a political party. The list of respondents is in Annex 1.

Summary of responses

Respondents were asked to consider four questions: what regulatory model would best suit the implementation of the Act; whether synergies existed with other EU regulations; how Ireland could boost its position of leading digital economy, and how Ireland's implementation of the AI Act can enhance the delivery of the goals of AI Strategy.

1. Configuration of national competent authorities

There was mixed preference among respondents regarding the model for implementing the national competent authorities under the EU AI Act. While there was no clear consensus, many respondents suggested a "hybrid" approach, with a central coordinating body working together with sector-specific authorities. This was seen as a way to leverage both centralised oversight and domain expertise. Key considerations highlighted by respondents included:

- Ensuring adequate resourcing, expertise, and multi-disciplinary capabilities within the regulatory bodies
- Establishing clear roles, responsibilities, transparent decision-making processes
- Facilitating effective coordination and information-sharing
- Providing for meaningful stakeholder engagement and public trust-building
- Enabling easy access to redress and complaint mechanisms for individuals

2. Synergies with other EU Regulations

Respondents widely acknowledged the need to identify and address potential synergies between the implementation of the EU AI Act and other related EU regulations and directives. Key areas of overlap and interdependency highlighted include:

- Data protection and privacy (General Data Protection Regulation)
- Digital services and markets (Digital Services Act, Digital Markets Act)
- EU Copyright in the Digital Single Market Directive and the Copyright and related Rights Act
- Cybersecurity (Cybersecurity Act, Measures for a high common level of cybersecurity across the Union, or NIS2)
- Environmental sustainability (European Green Deal, Corporate Sustainability Reporting Directive)
- Sectoral regulations (Digital Operational Resilience Act, Medical Device Regulation/ In-Vitro Device Regulation)

Effective implementation of the AI Act will require close coordination and information-sharing between the various national competent authorities and supervisory bodies responsible for these different regulatory frameworks.

3. Ireland's position as a leading digital economy

Respondents emphasised that for Ireland to leverage the AI Act to bolster its position as a leading digital economy, a careful balance must be struck between robust regulation and support for innovation. Key elements of "regulatory excellence" highlighted include:

- Clear, consistent, and timely communication of the regulatory framework
- Provision of guidance, templates, and other supports to help businesses
- Establishment of regulatory sandboxes
- Maintaining a highly skilled workforce through education and training initiatives
- Ensuring adequate resourcing and technical capabilities within Market Surveillance Authorities and Notifying Authorities
- Transparency in the Competent Authorities' own use of AI - leading by example

Respondents urged Ireland to capitalise on its experience in the D9+ group of digital leaders and continue shaping EU AI policy. Coordination with other national strategies, such as the National AI Strategy, will also be important.

4. Ireland's AI Strategy

Ireland's implementation of the AI Act can support the goals of the national AI strategy - building public trust, leveraging AI for economic and societal benefit, and enabling the development of AI. Key themes included:

- Aligning the AI Act's human-centric, ethical approach with national AI strategy
- Ensuring meaningful stakeholder and public engagement
- Developing AI literacy and upskilling initiatives to build workforce capabilities
- Mitigating the environmental impact of AI & integrating it with sustainability goals
- Protecting workers and addressing the potential disruption caused by AI adoption
- Maintaining a strong focus on AI research and development funding

Respondents also highlighted specific considerations, such as the development of AI resources and tools for the Irish language, and the identification of appropriate fundamental rights bodies to oversee the AI Act's implementation.

Next steps

The inputs received in the public consultation are feeding into the Department's work in designing a proposal for the most appropriate implementation plan of the EU AI Act.

The Department of Enterprise, Trade and Employment continues to consult with relevant government departments and public authorities prior to the next milestone in the AI Act on 2 August 2025, the designation of the national competent authorities.

Annex I – Respondents

1. American Chamber of Commerce Ireland
2. An Post
3. Boyle, Eamonn
4. Brightbeam
5. CeADAR
6. Central Bank of Ireland
7. Chambers Ireland
8. Chartered Accountants Ireland
9. CIPD Ireland
10. Coimisiún na Meán
11. ComReg
12. Derlinix
13. Egan, Jim: Ferrumar
14. Eit Health
15. Energia Ireland
16. Ergo
17. European Movement
18. EY
19. Fexco
20. Financial Services Union
21. FPAI - Fintech and Payments Association of Ireland
22. Genesys
23. Haughton; Denis Jude
24. Health and Safety Authority
25. IBEC
26. IBM
27. ICCL
28. ICTU
29. IHREC
30. IMRO/Irish Creative Industries Forum
31. Insight/SFI
32. IRDG - Industry Research and Development Group
33. Irish Copyright Licensing Agency
34. Irish National Accreditation Board (INAB)
35. IRMA - Irish Recorded Music Association
36. ITAG
37. Khoo, Erin
38. KPMG Law
39. LinkedIn
40. Mastercard

41. MedTech Europe/Health Tech Ireland
42. Microsoft
43. *ODRI* - Office against Discrimination; Racism and Intolerance
44. O'Mahony, Peter
45. Palma, Julia
46. PWC
47. Scale Ireland
48. Schneider Electronics
49. SFI Adapt
50. SIPTU
51. Social Democrats
52. Society of Actuaries
53. Tattan, Oliver
54. TCD Dean of Research Office
55. Technology Ireland
56. The Law Society
57. UCD Centre for Digital Policy
58. Údarás na Gaeltachta
59. Video Games Europe (VGE)
60. Vodafone Ireland
61. Weinmann, Karl
62. Workday