An Roinn Fiontar,
Turasóireachta agus Fostaíochta
Department of Enterprise,
Tourism and Employment

Employment Permits Minimum Annual Remuneration

Outcome of the Roadmap Review 2025

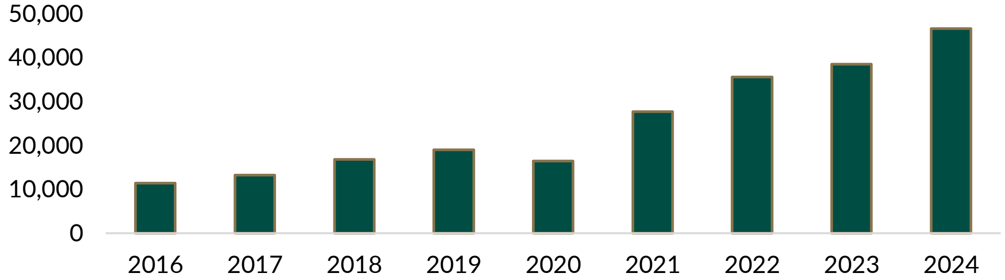
Table of Contents

1. INTRODUCTION

The Programme for Government 2025 sets an ambitious goal of creating 300,000 new jobs in the State by 2030. The Programme for Government 2025 sets an ambitious goal of creating 300,000 new jobs in the State by 2030. This is in the context of an aging population, declining birth rate, full employment, a limited pool for domestic labour market activation, and competition for in-demand skills across the European Union. Accordingly, the recruitment of non-EEA workers through the employment permit system will play an integral role in achieving this target.

There are approximately 65,000 people working in Ireland on current employment permits, with almost 40,000 of these permits having been newly issued or renewed during 2024. With the exception of the COVID-19 related slowdown in 2020, demand for employment permits has been increasing steadily over the last decade.

Figure 1: Employment Permit Applications Received per Year



In conjunction with this, the skillsets and types of roles recruited via the permit system have changed and evolved over recent years. There are more mid-skilled roles now eligible for employment permits and the median salary a permit holder now receives is lower than a decade ago. It is, therefore, increasingly important to ensure that these altered conditions do not negatively impact on the working conditions or quality of life for these workers, that they align with the principles underpinning economic migration[1], and facilitate the growth, development, and sustainability of enterprise in the State.

EXECUTIVE SUMMARY

The purpose of this review is to reflect on the 2023 Roadmap for increasing minimum annual remuneration (MAR) thresholds over a two-year period (see Figure 2). This Roadmap was developed in recognition of the need to mitigate risks associated with out-of-date thresholds, such as the suppression of domestic wages, potential employment rights abuses and ensuring migrants have the means to live without significant recourse to social protection (e.g., Working Family Payment). It is vital that the employment permit system addresses these challenges to ensure that it remains fit for purpose, balances the needs of employers and the rights of workers as well as maintains Ireland's reputation as an attractive place to work and do business. The first adjustments were introduced through an amendment to employment permit regulations commencing on 17 January 2024, and they affected new permit applications and renewal applications received from that date onwards.

However, in recognition of the challenges businesses are facing with increasing costs, the implementation of further increases across the remainder of the Roadmap has been reviewed following extensive stakeholder consultation with employers, employee advocacy groups and relevant government departments. The review is also cognisant of the current challenging economic conditions in respect of national, regional and global competitiveness.

It has been decided that the MAR thresholds will be increased over the coming years but that the manner and pace at which they are increased will be more graduated than was initially envisaged in the 2023 Roadmap. This approach reflects the indexation provisions set out in the Employment Permits Act 2024. It also reflects the feedback received from employers and migrant worker representatives regarding the need to ensure fair salaries for permit holders while mitigating against

[1] Economic migration policy - DETE

unintended consequences such as employers not being able to afford the increases and existing permit holders not having their permits renewed.

Employment Permit MAR thresholds will increase in 2026 as follows:

1. The MAR threshold for General Employment Permits will rise by 7.66% in Q1 2026, instead of the 14.7% in the 2023 Roadmap.
2. The Critical Skills Employment Permits MAR threshold will rise by 7.66% in Q1 2026, instead of 15.8%.
3. Sub-standard MAR thresholds will be phased out over the rest of the decade, by 2030, rather than by 2026. Rising initially by 9% in Q1 of 2026.

The Q1 2026 increases will be implemented on 1st March 2026.

ADJUSTMENTS FOR CERTAIN SECTORS/CATEGORIES

There are additional changes to MAR thresholds, outside of the current Roadmap, that will be implemented to ensure that the permit system facilitates the attraction of highly skilled workers in general, and health care workers in particular. These additional provisions are as follows:

1. A lower General Employment Permit salary threshold will be implemented for recent non-EEA graduates from Irish third level institutions, who have graduated in the previous 12 months.
2. A lower Critical Skills Employment Permit salary threshold will be implemented for recent non-EEA graduates with a relevant degree, who have graduated in the previous 12 months.
3. Critical Skills roles, that are subject to the public sector pay deal, will be exempted from the minimum salary requirements for Critical Skills Employment Permits. This will also be applied to community and voluntary organisations whose pay scales are linked to the public sector pay deal.

These measures are intended to ensure that Ireland can both retain and attract highly skilled workers early in their careers, facilitate the continued recruitment of health and social care workers and protect this critical area of public service delivery. The full suite of measures is summarised in the Review Outcome Summary section.

INTRODUCTION TO MIMIMUM ANNUAL REMUNERATION

The Minimum Annual Remuneration (MAR) is the lowest salary for which an employment permit can be issued. The MAR threshold for a role is applied at the point of application, either for a new permit or the renewal of an existing one. It is important to highlight that MAR thresholds have always been set in excess of the national minimum wage (NMW) in order to achieve the following economic migration policy objectives:

- Employment permit holders should be net contributors to the Irish economy and as such should have the financial capacity to support a decent quality of life for themselves and, where appropriate, their immediate families, without undue recourse to State resources.
- To mitigate any disruption or displacement to the domestic labour market, including potential wage suppression.
- To mitigate the risk of the employment permit system being used as an alternative to improving pay and conditions, innovation and upskilling.

In 2018, an interdepartmental group conducted a review of economic migration policy. Among the recommendations emerging from the review was support for increasing the MAR threshold for Critical Skills Employment Permits (CSEPs) to ensure closer alignment with average annual earnings. It was also recommended that the remuneration thresholds for the General Employment Permits (GEPs) should be reviewed. A review of all MAR thresholds was conducted in 2023, and it was found that the MAR thresholds for all permit types had become outdated, with most MAR thresholds having stagnated since their implementation.

In 2006, when the MAR threshold of €30,000 was initially set, the average industrial wage was €29,911 for both part-time and full-time workers. It was subsequently retained in 2014 when the Employment Permits (Amendment) Act 2014 came into force. By contrast, since 2014, average weekly earnings in the State have increased by at least 47%. For instance, in 2024, the average industrial wage for both part-time and full-time workers in industry[2] was €58,000 and the median annual salary across all sectors (including, for example, health, hospitality, construction, ICT and finance) was €44,816.

In accordance with the Employment Permits Act 2024, the MAR threshold must increase annually in line with the annual change to average weekly earnings. Had the MAR threshold for GEPs increased by a commensurate percentage over the last decade, it would now be in excess of €42,000 rather than the current rate of €34,000.

Another issue that has arisen over the more recent past is the provision of employment permits to certain sectors (agri-food, healthcare) on rates below the GEP threshold. The lowest of these, €22,000[3] for meat processing operatives, was first implemented in 2018. This threshold was subsequently overtaken by the NMW twice before being increased to €30,000 under the 2023 Roadmap.

---

[2] Industry here using CSO categorisation to include mining, manufacturing, electricity/gas/water supply and similar activities, not including construction.
[3] This was 13.6% above the NMW at the time of introduction.

2. ROADMAP, REVIEW AND CONSULTATION

2023 ROADMAP

It was in the above context that in December 2023, a Roadmap detailing planned MAR threshold increases up to 2026 was published. An initial increase in the GEP MAR threshold to €34,000 for most sectors was introduced in January 2024. The MAR thresholds for eligible roles in the agri-food sector such as horticulture operative and meat processing roles were increased to €30,000.

The Roadmap aimed to mitigate risks associated with those out-dated thresholds, such as the potential suppression of domestic wages, increasing risk of exploitative practices, and to ensure economic migrants have sufficient means to live in Ireland without undue recourse to State supports. It also recognised the valuable contribution economic migrants make to the economy and society and aimed to ensure they have the means to make a decent life for themselves and their families, with particular consideration given to access to the Department of Justice, Home Affairs and Migration's Family Reunification Scheme.

Figure 2: 2023 Roadmap

Date	Jan '24	Jan '25	July '25	Jan '26
Meat Processing / Horticultural	€30,000	€32,000	€34,000	€39,000
Healthcare Assistant; Home Carer;	€27,000	€30,000	TBD	TBD
Graduate Positions; Language Skills Specialists	€34,000	€39,000		
Butcher/Boner	€34,000	€39,000		
GEP General Threshold	€34,000	€39,000		
CSEP with Degree	€38,000	€44,000		
CSEP without Degree	€64,000	no change		
Intra-Company Transfer (Trainee)	€34,000	€39,000		
Intra-Company Transfer; Contract for Services	€46,000	€53,000		

Following the implementation of the initial phase of the Roadmap, the Department of Enterprise, Tourism and Employment (DETE) had extensive engagement with external stakeholders regarding the proposed subsequent increases set out in the Roadmap. In light of concerns raised during this engagement, relating to the general increased costs of doing business, a review of the Roadmap was commenced in late 2024. The aim of this review was to ensure that all future MAR threshold adjustments were implemented in a sustainable and equitable manner. The review included a targeted consultation launched in November 2024, which sought feedback from employer and employee representative groups and interested stakeholders.

PUBLIC CONSULTATION

CONSULTATION RESPONDANTS

The Department of Enterprise, Tourism and Employment consultation which closed in January 2025, attracted a total of over 150 responses received from a broad range of sectors, including from employers, permit holders, trade unions and representative bodies.

The consultation was initially circulated to entities who had engaged with the department on the Roadmap during 2024. Consequently, employers and their representative bodies make up the majority of responses. This provided greater insight into the particular challenges across a broad range of industries and their recommendations. However, when formulating any amendments or additions to the Roadmap, suitable weighting was applied to the inputs from permit holders, employees and their representatives.

The consultation questions covered the impacts of the first increases in 2024, the potential impacts of future increases, sector-specific observations or considerations, as well as any potential suggestions or areas of development. These questions are detailed fully in the appendix of this report. These respondents provided in-depth information on the impact of the first increases, risks or benefits associated with future plans, as well as any potential alterations to the Roadmap they saw as being beneficial.

The agri-food, healthcare, and manufacturing sectors were the sectors with the most submissions. Approximately 25% of these submissions were from the agri-food sector while over 20% of these submissions came from the health and social care sector.

The information received in these submissions has informed the content and direction of this review.

The main findings of this consultation process are outlined below:

Figure 3: Consultation Respondents by Economic Sector

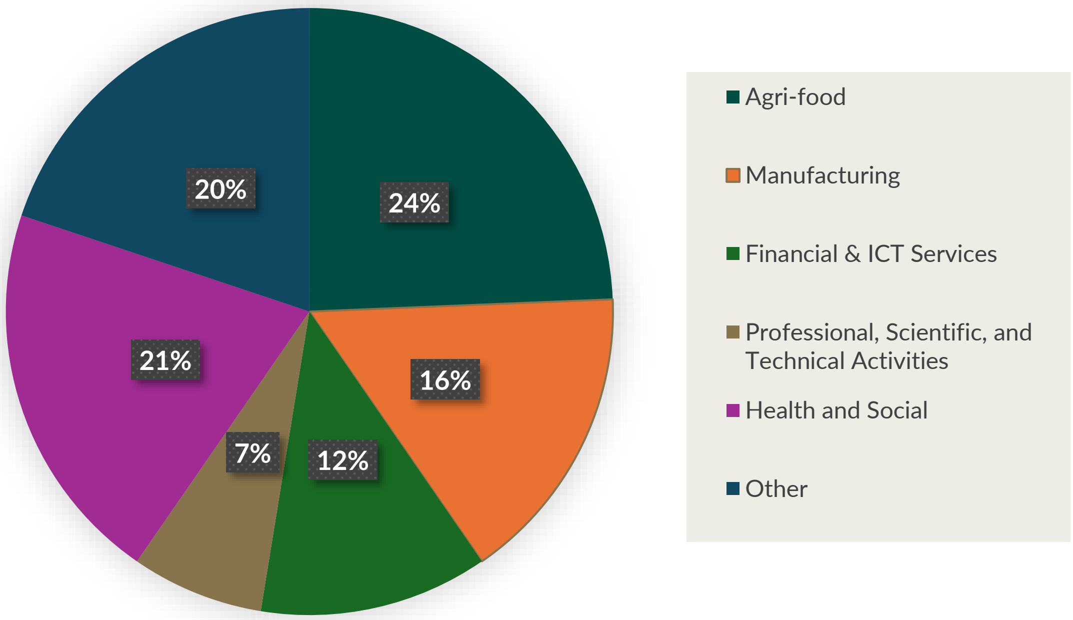
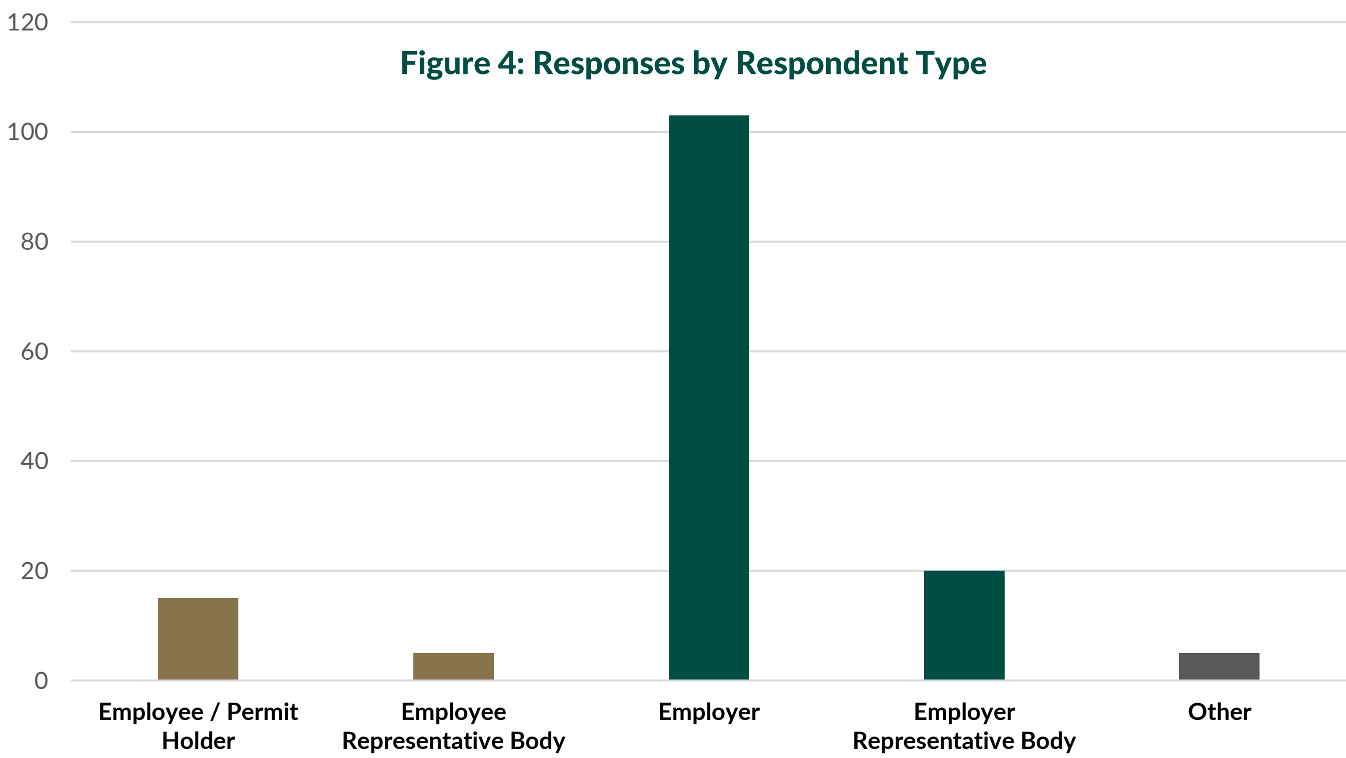


Figure 4: Responses by Respondent Type



TRENDS IN FINDINGS – RESPONDENTS' OBSERVATIONS AND THEIR RECOMMENDATIONS

The information detailed below represents a summary of the observations, issues and recommendations raised by the respondents during the recent consultation process.

GENERAL OBSERVATIONS AND CONCERNS ON THE ROADMAP

Where concerns were raised in responses to the consultation, they, in the main referred to retention of current permit holders, recruitment of new permit holders and, relatedly, the pace of increase.

- Some employers stated the increases fell out of step with their current pay scales.
- Some respondents indicated that the proposed Roadmap increase to €39,000, would, if implemented, cause the required salary to fall outside of the pay scales associated with the role or level of experience of the permit holder.
- Some employers flagged that the recommended increases could mean that they may be unable to renew their existing employment permits.

This inability to meet the proposed €39,000 minimum was also a primary concern raised in the submissions of current permit holders and their representatives as it could result in their permit not being renewed. It should be noted that, despite similar concerns raised on the Roadmap increases implemented last year, 2024 was the highest demand year on record for the employment permits system.

Applications for new permits in 2024 were up 5.3% and renewals up 306.9% compared to 2023, for a total number of applications received of 46,600. While the absolute number of renewal applications quadrupled, the ratio of renewable permits expiring to renewal applications received remained steady in 2024, at around 45.7%, consistent with previous years.

Employers and their representatives also expressed a belief that the application of one MAR threshold for all General Employment Permits would not reflect typical earnings in certain sectors, particularly agricultural roles which had previously been accommodated with MAR thresholds below the standard rate.

Another concern raised was the potential knock-on effect of increases for all other workers, both those in the same or similar roles as permit holders and those in more senior positions. This was particularly associated with responses from the sectors which indicated lower general rates of pay or margins more vulnerable to labour costs.

A number of trade unions also made submissions to the consultation, and these were unanimously opposed to any deviation from the 2023 Roadmap, noting that the outcome of the full implementation of that Roadmap would still have permit holder salaries below median earnings in the State. Those groups representing migrant workers were supportive of increases but proposed that increases should be made in conjunction with Sectoral Enforcement Orders (SEOs). This would mean that the increases would be automatically applied to all workers, not just those applying for a new, or the renewal of an employment permit. It would also widen the pool of lower-paid employment permit holders who could apply for the Department of Justice, Home Affairs and Migration’s Family Reunification Scheme.

The advantages they outlined for this approach would be that, by creating a sector-wide minimum salary for permit holders and all other workers in the same role, there would be no incentive to not renew an employment permit at the new minimum, instead of a MAR threshold that may be higher than the recruitment wage of EEA workers. In addition, such an increase would take immediate effect, whereas the MAR threshold increases only apply at time of the grant or renewal of an employment permit. The introduction of measures such as SEOs was outside the scope of this review.

In a similar position to the above lower-paid sectors, are those who recruit recent graduates through the employment permit system. These graduates, while possessing the necessary qualifications for knowledge-driven work, often have little to no industry experience. Consequently, they often fall at the lower end of pay scales for employers who offer graduate recruitment schemes which also provide an opportunity for industry experience and additional upskilling.

Some employers indicated that their graduate schemes are either below the current salary threshold of €34,000 or will be surpassed by the Roadmap level of €39,000. This disparity could most keenly affect employers who have partnered with Irish Higher Education Institutes by introducing a barrier to the recruitment of non-EEA graduates.

Regarding the implementation of the first Roadmap increases in January 2024, many employers felt that the short lead in time of one month was detrimental to their recruitment practices and business planning. This was particularly felt by employers who require longer periods for negotiation with buyers, or for requesting additional funding to meet the increased MAR thresholds.

MOST FREQUENTLY SUGGESTED RECOMMENDATIONS IN CONSULTATION RESPONSES

INDEXATION

Having examined the inputs and comments submitted by respondents to the consultation process around future direction, the most referenced suggested approach for future adjustments to the MAR thresholds was some form of indexation. That is, linking the proposed increases to the MAR threshold to a metric related to income in the State.

Some suggested approaches included linking increases to inflation, the consumer price index, or to increases to national minimum wage that is currently informed by increases to median hourly earnings. As indicated in the information note accompanying the consultation, this is also the approach taken under the Employment Permits Act 2024 and will remain in force beyond the current Roadmap to prevent stagnation.

Under Section 47(4) of the Act, where the Minister finds that average weekly earnings in the State have increased since the MAR threshold was last set, then it must also be increased by at least a commensurate percentage. This will prevent future MAR thresholds from falling out of line with general increases to earnings in the State and these changes will be implemented annually, at a commensurate pace.

SECTOR SPECIFIC MARs

As outlined above, a concern raised by numerous respondents to the consultation process was that a standardised MAR threshold would be a challenge due to sector specific concerns. These ranged from labour costs being the largest expense for the industry, funding models or supply contracts that are multi-year in nature making it challenging to pass-on increased labour expenses, alongside substantial competition from countries with lower labour costs.

Lower than standard MAR thresholds have been implemented in previous years, particularly in agri-food and health settings. While the employment permit system has facilitated a significant source of needed labour in these areas, these thresholds have also caused some issues.

For many roles with a below standard MAR threshold, the median salary received by a permit holder was this lower limit. This typically remained the case even where the MAR threshold had been set years prior, which indicated stagnation in the wages issued to permit holders. This was often evident at the time permits were renewed as well. This presented challenges regarding the impact of increased cost of living, potential need for recourse to State supports, and access to the Department of Justice, Home Affairs and Migration's Family Reunification Scheme.

REMAIN AS IS OR DELAY INCREASES

After indexation, recommendations on the delay/staggered implementation, or retaining, the current rate of remuneration were the most suggested options. The one-month lead in for the first of the Roadmap increases in 2024, to be followed by another increase of similar scale 12 months later, was presented as the primary challenge.

Indexation was offered as one potential avenue to addressing these issues, or alternatively, implementation over multiple years, increases on a less than annual basis, or keeping the current MAR thresholds were all suggested. It should be noted that under current legislation deferral over multiple years would be limited by the indexation requirement of an annual review, meaning that where average earnings have increased in the year since September 2024, an increase must be made.

FAIR DEAL FUNDING

The primary focus of long-term care providers was the funding model that is the basis of a significant portion of their ability to pay labour costs. With this consideration being raised by the majority of respondents in the health and social care sector.

The first Roadmap increase of the MAR threshold for Health Care Assistants, Home Carers and Care Workers was from €27,000 to €30,000. This was deferred for a year until 17th January 2025. This deferral was in part due to allow greater time for providers to incorporate the increased labour costs into their business plans and negotiations under the Fair Deal Scheme.

Over the course of 2024 this department met extensively with the Department of Health on this matter, including meeting with the National Treatment Purchase Fund. Consultation has also been ongoing with representatives of the sector as well as of permit holders working in these roles.

GRADUATES

A significant concern of many employers related to entry level recruitment and graduate programmes. Representatives of tertiary education expressed similar concerns regarding the pathway of non-EEA graduates in the State to employment. The recruitment of recent graduates does not seem to have declined relative to other immigration permissions. For CSEPs, this cohort remains one of the largest at time of application, representing in the 20-25% range annually over the previous five years.

Respondents to the consultation have, however, highlighted that this cohort, despite having specialised knowledge and skillsets, are typically at the start of their professional life. Consequently, the positions or graduate schemes they apply for may be at the lower end of pay scales but are less likely to stagnate.

MINIMUM WAGE

While some respondents suggested indexing the MAR threshold increases to minimum wage increases, others suggested that the threshold should be reduced to national minimum wage in general. It is not the policy for employment permits to be issued for minimum wage in general, including for the following reasons:

- This would significantly increase the risk that the employment permit system may have a suppressive effect on average earnings in the State, particularly where there is a high concentration of permit holders in an occupation or sector.
- The greatest portion of employment permits are issued to people relocating to Ireland to take up employment. A principal underpinning economic migration is that they should be in a position to support themselves and their families without undue recourse to State supports.
- Relocation can often be an expensive process, removing the permit holder from their established support system and increasing their reliance on their employment status for their immigration permission. Reduction in the MAR threshold increases the vulnerability of people in this position.

EXTENSION OF PERIOD TIED TO INITIAL EMPLOYER

The Employment Permits Act 2024 introduced the ability to change employer while retaining the same employment permit. Such a change of employer can currently be done after nine months on the initial permit, as can an application for a new employment permit be submitted.

Some employers have shared concerns on this increased flexibility, including concerns that they could lose out on their initial investment in recruitment, relocation and training, if the worker was not tied to their organisation through their permit.

The intention behind the change of employer option is to both ensure that permit holders are not unduly attached to their employer as a result of the employment permit and to bolster the place of the employment permit system in a healthy, dynamic labour market.

CLAWBACKS / RECOUPING COST ASSOCIATED WITH RECRUIMENT FROM PERMIT HOLDERS

Following the increase in permit holders' ability to move between employers, some employers have suggested a compromise in this area would be the ability to recoup some of their initial costs if the permit holder changes employer early in their contract. Where an employee leaves their initial employment before a set period of time, the employer would recoup the costs of recruitment and relocation, this is often referred to as a clawback provision. It is extremely important to note that any such deductions are classified as an offence under the Employment Permits Act 2024.

Any attempt to divest the permit holder's wages or otherwise seek to recover from them costs associated with the application for an employment permit, recruitment, or traveling expenses is considered an offence. This serves as a protection of permit holders who would otherwise be in a more vulnerable position.

CONCLUSIONS TO THE CONSULTATION PROCESS

Overall, the engagement with employment permit stakeholders provided a number of valuable insights on the review of the Roadmap. The consultation questionnaire was circulated extensively over a two-month period that concluded in January 2025. There was a significant rate of response to the consultation process, which was representative of the target audience, including a high level of input from the agriculture, meat processing and nursing homes sectors who are all high-volume users of the employment permit system.

The views expressed in the consultation responses are broadly supportive of the existing employment permits system and are supportive of the proposed intention to make alterations to the current remuneration process around the issuing of employment permits.

Concerns have been raised by some respondents across a range of sectors as to the levels of remuneration proposed in the 2023 Roadmap. These respondents have requested other options to be identified and considered that could potentially have less of a financial burden in terms of labour costs that in turn could lead to further increased costs of doing business for employers.

3. POLICY CONSIDERATIONS

The purpose of this review was to better understand the impact that the January 2024 increase in MAR thresholds had on businesses, employees and permit holders and the predicted impacts the future increases might have. The review considered if the Roadmap in its 2023 form was the appropriate path forward, whether it required adaption to a changing economic context, or whether indexation alone is the appropriate measure.

Indexation is a mechanism implemented to ensure that the remuneration rates for employment permits cannot stagnate and to also ensure that those rates remain in step with earnings in the State. This mechanism was introduced in September 2024 via the Employment Permits Act 2024 taking effect in 2026. As indexation was not in place in the prior decade, the 2023 Roadmap was designed to address the issues arising out of stagnation, principally:

- Realignment with overall earnings in the State
- Meeting thresholds for family reunification as set by the Department of Justice, Home Affairs and Migration
- Gradual rationalising of sub-standard MAR thresholds to be in line with standard GEP threshold and
- Ensuring that the above objectives are achieved in a manner that is responsive to and sustainable within the current labour market and economic context.

These issues are discussed in greater detail below.

REALIGNMENT

The rationale for the development of the 2023 Roadmap was to address wage stagnation, an issue that has been raised in multiple reviews of the employment permit system. The €30,000 threshold for employment permits was established with the 2006 Employment Permits Act and was retained in 2014 when the General and Critical Skills Employment Permit types were introduced. Had this threshold risen with average weekly earnings, as it would under indexation, it would now be at least

€42,000, 41% above the €30,000 set in 2006. The increase to €34,000, implemented in January 2024 was a 13.3% increase.

The recommendation to realign the MAR thresholds and average earnings in the State has been discussed for some time. A 2017 review of MAR thresholds found that there had been, since 2008, a notable mismatch between the 2006 MAR thresholds and average earnings. This review recommended that the MAR threshold should be realigned with the average annual salary for all employees[4]. The average industrial wage in 2006, the metric then available, was €29,911. By 2024, the most recent available year, the average regular earnings for workers in industry, the comparable metric for average industrial wage, had increased by 61% to €50,566. The average total earnings for part- and full-time workers in all economic sectors was €50,369. A broader review of economic migration policy was conducted by an Inter-Departmental Group in 2018. This Inter-Departmental Group endorsed the 2017 recommendation to increase MAR thresholds to realign with average earnings, specifically for the minimum salary of a CSEP[5].

Indexation, the mandatory annual increase of the MAR thresholds by at least the same percentage of increase to average weekly earnings, will prevent wage stagnation recurring in the future. Without additional remedial measures, indexation cannot address the stagnation that has already occurred, and which has increased the risk of the employment permit system being used to source workers for lower skilled roles and lower rates of pay.

REUNIFICATION

The lowest threshold for family reunification was initially based on the MAR threshold for a GEP. This was set in the Department of Justice, Home Affairs and Migration's 2013 Policy Document on

[4] Based on the Total Average Earnings for all employment status in the CSO's EHA05 – Average Annual Earnings and Other Labour Costs
[5] Review of Economic Migration Policy 2018

Non-EEA Family Reunification. This €30,000 gross threshold is the minimum income required for a spouse to join the permit holder. The minimum income for a child to join the permit holder is based on the threshold for the working family payment.

The working family payment threshold increases on an annual basis. Currently, the net threshold for receipt of the working family payment (gross pay minus tax, employee PRSI, USC and superannuation) for one child is €36,660 (c. €44,000 gross) and €41,912 (c. €52,000) for two children, increasing for subsequent dependants. There are currently 21,600 active GEPs that were issued after the MAR threshold increases of January 2024, with 86.5% of these having a salary of less than €44,000.

RATIONALISATION

While the majority of GEP eligible occupations are covered by the €34,000 MAR threshold, there are four occupations that currently have thresholds below this. These exceptions were developed in response to representations from specific sectors and related government departments. The median remuneration for these roles has not risen in line with increases in median national earnings. Under the 2023 Roadmap, it was intended to rationalise minimum thresholds for all employment permits, irrespective of the sector. The rationale for this recommendation was to eliminate the ad hoc, two-tier system that had arisen, to promote principles of equity and ensure that *low cost labour* via the employment permit system is not considered an alternative to innovation, automation, or improving pay and conditions.

These lower rates present challenges, as evidenced by the fact that occupations with sub-standard thresholds are ineligible for family reunification beyond spousal reunification. Where sub-standard rates had been set for agri-food roles, these had stagnated to the point where the NMW had exceeded them and had become the de-facto minimum for those roles. This contravenes a basic principle of economic migration policy, which is that permit holders should not need to have recourse to State support and should ideally be tax-positive. Of the 12,000 currently active below-standard MAR employment permits, 79% have a listed salary at or below the €30,000 current minimum.

It is also the case that where sub-standard minimums are implemented, this tended to become a ceiling rather than a floor. The majority of permits for these roles, are being issued at the minimum possible salary, both when the permit is first granted and when it is renewed. This is particularly evident with regard to meat processing operatives who had a median equal to the minimum allowed €22,000 for five years. This only increased in 2023 as NMW was greater than the MAR threshold and so the median increased to match the minimum wage.

The prevalence of permits with sub-standard MAR thresholds has increased substantially over the years. In 2024, over 7,700 employment permits were issued for these roles. This represents 20% of all permits issued that year. Of these 7,700 permits, 98% were at a remuneration rate below the €34,000 standard threshold for GEPs.

RESPONSIVENESS TO CURRENT CONTEXT

Stagnation and the resulting policy issues have been reported as needing to be addressed since the 2017 MAR threshold review. They were the main drivers of the 2023 Roadmap. However, one year on from the initial increases, the recent policy and economic context (including the increased cost of doing business) has led to the current policy review.

Over the past year, the department has had extensive engagement with users of the employment permits system. This has included representations from employers, permit holders and their representative bodies, in-person meetings with relevant stakeholders, consultative exercises including one focused on health and social care workers and a broader online consultation which garnered over 150 responses. This engagement has provided insight into the experiences and challenges faced by employers and permit holders. Aspects of the current context to consider include:

- The increase to the MAR threshold occurred at the same time as other changes to the employment regulatory framework. Over the last year there have also been increased costs of business resulting from provisions such as increases to employer PRSI and increases to the NMW. Pension auto-enrolment is also projected to increase costs to employers. The Government has recently decided to keep the number of paid statutory sick-leave days at five.

- Despite the concerns raised about the Roadmap increases, the first of which were implemented last year, 2024 saw the highest demand on record for employment permits. Applications for new permits were up 5.3% and renewals rose by 306.9% compared to 2023, with an overall total of 46,600 applications. While the absolute number of renewal applications quadrupled, the ratio of renewable permits expiring to renewal applications received remained steady in 2024, at around 45.7%. This percentage is consistent with previous years and demonstrates that there was no overarching fall-off in renewal as a result of the increases to the MAR thresholds.

- The January 2024 increases were set by S.I. No. 680/2023 in December 2023. From Q4 2023 to Q1 2025 average weekly earnings in the State rose 11%. The minimum wage increased by 6.3% in January 2025 and will increase in 2026, when any MAR threshold changes are implemented.

- Ireland remains close to full employment with unemployment at 4.7% in August 2025 and the lowest level since 2001, occurring earlier this year, at 3.9% in February 2025. The number of people in employment increased by 70,000 between Q4 2023 and Q4 2024.

There is an increasing risk of EU-wide economic volatility, particularly in relation to foreign direct investment and export-oriented industries. The Spring 2025 ESRI commentary suggests that the economic sectors of Industry (excluding construction) and Information and Communication would be the most vulnerable to tariffs. It indicates that these sectors may reduce their workforce if they believe the diminished trade to be a long-term effect rather than a short-term shock.

Manufacturing currently accounts for 7.8% of all active permits and ICT accounts for 15%. The median salary of all permits in these sectors is €43,000 and €57,500 respectively. If we focus on the cohort in these industries that is most vulnerable to increases in the MAR threshold it would be individuals on first time GEPs, as these may require renewal at the new MAR rates. The median salary for these smaller cohorts (c. 1000 in each sector of 68,000 active permits) is €34,000 for manufacturing roles and €36,553 for the ICT roles.

HEALTHCARE AND THE PERMIT SYSTEM

Healthcare utilises the employment permit system more than any other sector. In four of the previous five years, health and social care work was the area of activity in receipt of the most employment permits. The employment permit system is, therefore, integral to the provision of health and social care in the State and specific regard to this sector should be included in the assessment of changes to MAR thresholds.

When the initial increase of the 2023 Roadmap was implemented in January 2024, one exception was made. The increase of the MAR threshold for Health Care Assistants (HCAs), Home Carers and Care Workers, from €27,000 to €30,000 was deferred for one year.

Health Care Assistants, Home Carers and Care Workers

The basis for this deferral was tied to the funding model for nursing homes, the Fair Deal Scheme or Nursing Home Support Scheme. This model allows for nursing homes to negotiate their funding with the National Treatment Purchase Fund (NTPF) on a one-to-three-year basis (although the majority do so on an annual basis). This results in a contract that stipulates what funding the NTPF will provide but also how much the nursing home can charge residents. This process means that nursing homes are less readily able to adjust pricing to accommodate increased costs than other private businesses. Due to the lead-in time associated with renegotiating contracts, a deferral was put in place. After extensive engagement with the sector and the Department of Health over 2024, the increase to €30,000 was implemented for these roles in January 2025 with consultation ongoing between both departments to ensure a cohesive response to increases to MAR thresholds.

Health Critical Skills Employment Permits

Nursing has been the occupation that has received the most permits cumulatively over those five years, with doctors and HCAs being third and fourth.

Table 1: Permits issued to Health and Social Care Workers

Permits Issued 2020 to Date					
Nurses	Doctors	HCAs	All Permits Issued 2020 to Date		
19,067	11,415	11,176	154,418		
Health and Social Work as a % of all Permits Issued					
2020	**2021**	**2022**	**2023**	**2024**	**2025**
31.74%	35.61%	24.50%	32.39%	31.75%	27.04%

A point of consideration with the implementation of indexation relates to the issuance of CSEPs to public service health and social care roles. For example, HSE nursing roles on CSEPs fell below the salary requirements for a permit in the first half of 2024. While increases to salaries arising from the public service pay agreement have again allowed them access to CSEPs, the introduction of indexation will, by 2026, set remuneration rates higher than the pay scale point at which the public service recruits. The recruitment salary for HSE nurses in September 2025 is €40,267. Consequently, any increase in the MAR threshold for CSEPs beyond this, which would represent a 6% increase, would be detrimental to the recruitment of non-EEA nurses in the public sector. This particular risk is addressed in the MAR threshold exemption for critical skills public sector roles. These roles also differ from the majority of other employment permit roles in that there is robust collective bargaining in place, leading to an annual incremental pay scale alongside adjustments under public pay deals.

4. CHANGES TO REMUNERATION – POLICY OUTCOME

Some increase to the MAR thresholds must be confirmed in 2025. Under Section 47(4) of the Employment Permits Act, the MAR threshold for employment permits must increase by the same percentage as increases to average earnings in the State on an annual basis, and this is referred to as indexation. The lowest increase that must be implemented under indexation, requires a 7.66% uplift. This is based on the finalised CSO figures for average weekly earnings in Q1 2025 (EHQ03). The finalised Q1 2025 is the most up to date data available for the 2025 MAR threshold increases required by indexation. It is important to note that, being the first year of indexation, only Q3 to Q1 data will be available for review. Subsequent years will consider Q1 to Q1. On average since 2020, the Q1-Q1 annual increase has been 4.9% which may be more representative of indexation in subsequent years. It has fluctuated between 3.1% and 7.6% in that same period.

The below section details the revised approach to increasing MAR thresholds, including the associated benefits and risks. The revised approach is in short, a synthesis of the Roadmap and indexation, which addresses the lowest rates of pay in a slower, more gradual approach. Additional provisions are included in this revised approach relating to the removal of the current sub-standard MAR thresholds, a new MAR threshold for graduate roles and alternative provisions for public services.

REVISED APPROACH INDEXATION & RATIONALISATION

INCREASE BY MINIMUM PROVIDED FOR IN THE EPA 2024, IN 2026, WHILE PHASING OUT SUB-STANDARD MARs

This revised approach represents the increase to the MAR thresholds provided for under the Employment Permits Act 2024, at 7.66%, and therefore the most readily adapted to by employers. This is required under the indexation provisions of the Act which are based on the change in average weekly earnings in the latest CSO quarterly release of Average Earnings, Hours Worked, Employment and Labour Costs (EHQ03). The latest release includes the final figures for Q1 2025.

This revised approach offers the lowest increase to minimum salaries allowable under indexation and is therefore the lowest additional cost to employers in a time of increased uncertainty. This approach, however, cannot address existing stagnation alone. As a result, it has been decided that such an approach be implemented in conjunction with greater increases to the sub-standard MAR thresholds. Increasing the sub-standard thresholds faster than the standard thresholds allows for their gradual phasing-out over the next five years, achieving the policy intention of rationalisation. Combining this baseline indexation with rationalisation provides for a measured increase to the MAR while gradually addressing the risk associated with the lowest paid roles. Further detail is provided on rationalisation in the additional provisions detailed below.

Table 2: Revised Approach: Minimum increase to standard MARs, 9% to sub-standard MARs

Baseline Indexation & Rationalisation (Based on CSO data, 7.66%)	Current	Q1-26
Meat & Horticultural Operatives (9%)	€30,000	€32,691
HCAs, Home Carers, Care Workers (9%)	€30,000	€32,691
GEP & Intra-Company Trainees (7.66%)	€34,000	€36,605
CSEP (7.66%)	€38,000	€40,904
CSEP Without Degree (7.66%)	€64,000	€68,911
Intra-Company & Contract for Services (7.66%)	€46,000	€49,522

Benefits

- Based on the CSO's figures for Q1 2025, the increase to average weekly earnings is 7.66%. This is the lowest increase permissible under the EPA 2024. Therefore, costs may be more easily absorbed by employers.
- For permit holders who will have their permit renewed after the increase, a 7.66% salary increase after two years in a role is the option least likely to present a barrier to renewal.

- While being the legal minimum it represents an increase in line with average earnings in the State from Q3 2024 to Q1 2025.
- National Minimum Wage increased by 6.3% in 2025, any increase of €0.18 or more in 2026 will mean NMW has increased more than the recommended 2026 MAR threshold increase. This suggests some of the increase will already be captured through any upwards pressure arising from NMW increases.
- If implemented in conjunction with the rationalisation of the sub-standard MAR thresholds, it can significantly reduce the number of tax-negative roles and begin to increase access to family reunification.

- It is important to highlight that the 2026 changes under this approach do not realign MAR thresholds to average earnings in the State as intended under the 2023 Roadmap, instead maintaining the current disparity. This is the first stage of a gradual realignment of the thresholds out to 2030. In order to address the existing disparity over the medium term, consideration will be given to increasing the MAR thresholds in excess of the minimum required. This is likely to be more readily achievable in subsequent years where the expected change to average weekly earnings is forecast to be lower.

COMPARISON OF IMPACT TO CURRENT FIRST TIME GENERAL EMPLOYMENT PERMITS ELIGIBLE FOR RENEWAL

The below table represents a comparison of the impact of the revised increases to the 2023 Roadmap in the context of GEPs that may require renewal. It provides the percentage of currently active, first time GEPs, that are below the 2026 increases.

This analysis is restricted to new GEPs rather than Critical Skills Employment Permits as CSEPs do not require a renewal. Consequently, the currently active CSEPs are not affected by increases to the MAR thresholds in the same way as first time GEPs.

The majority of GEPs that might be renewed are of a salary lower than the Q1 2026 increase, even the minimum 7.66% increase required by indexation would put two thirds below the new threshold. For the sub-standard MAR thresholds, as most of them are issued from the minimum salary possible, almost all are below the potential new thresholds. For both the 2023 Roadmap and the revised approach, effectively all of the sub-standard threshold permits would require uplift at time of renewal.

It is also important to note that the salary data available is based on information provided at time of application. Where the permit holder has received a raise while on the permit, e.g. after probation or their first year, that will not be evident in the data. Therefore, the actual number of GEP holders below the future thresholds is, likely to some extent, to be lower than the below.

Table 3: Percentage of Active GEPs, that may require renewal, with salaries below the proposed changes

GEP Active Permits by role	% of New Active GEPs Below Future Threshold for Role	
	2023 Roadmap	Indexation & Rationalisation 7.66% & 9%
GEP Standard Roles	71%	67%
Meat & Horticultural Operatives	98%* (98%)	98%
HCAs, Home Carers, Care Workers	91%* (97%)	96%

*For the below standard MAR thresholds, the Roadmap proposed two increases per year, €32,000 in Q1 to €34,000 in July, and then aligned with the GEP standard the following year (min €39,000). These percentages only represent the first increase to €32,000. If the €34,000 is taken, Meat and Horticultural Operatives remains at 98% and the health and social care roles increase to 97%.

ADDITIONAL PROVISIONS

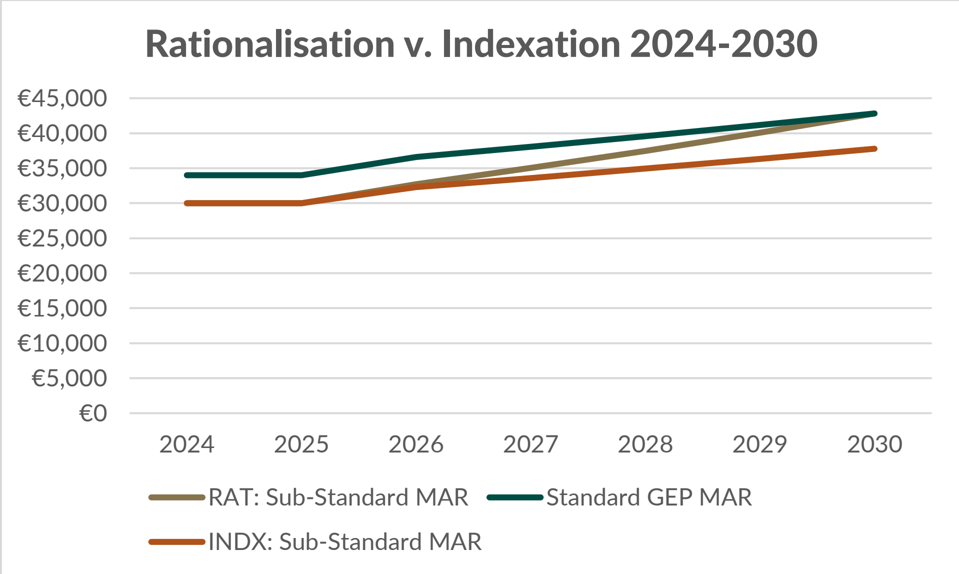
RATIONALISATION

Rationalisation is the removal of the current sub-standard MAR thresholds for GEPs, currently in place for Meat Processing and Horticultural Operatives, Health Care Assistants, Home Carers and Care Workers. This is the intended outcome of the 2023 Roadmap and it is intended that this is still implemented, given the pronounced stagnation in rates of pay specific to these roles. In general, the median salary received by permit holders in these roles, is equal to the legal minimum and this only increases when there is a legal requirement to do so e.g. the 2024 MAR threshold increases, or when the NMW has overtaken existing MAR thresholds.

Rationalisation is a feature of the 2023 Roadmap that can be implemented in a more gradual manner. Effectively, how this is operationalised is that the below standard thresholds are not increased directly in line with indexation but as an increasing percentage of the standard GEP MAR threshold. Every year, the sub-standard MAR threshold increases slightly faster than that of the standard threshold, so that it catches up with it by the end of the decade.

Taking the 2026 increases as an example, the standard GEP threshold increases by 7.66% and the sub-standard threshold is increased by 9%, from 88.2% of the standard MAR threshold, to 89.3% of it. The year after, whatever the standard GEP MAR threshold increases to, the below-standard increases to 92.5% of it, realigning the standard and sub-standard rates by 2030. If, instead, both thresholds were subject to the same rate of indexation, maintaining the relative difference between them, the current €4,000 disparity may increase to €5,000 by 2030. Both trajectories are detailed in the below graph, demonstrating the gradual realignment of the GEP MAR thresholds and the risk of an increasing divide if this is not addressed.

Figure 5: Line chart demonstrating increasing the sub-standard MAR to eventually align with the standard MAR, versus increasing by indexation only.



GRADUATES

The employment permits system is intended to facilitate access to skilled workers who are in inadequate supply within the EEA. The MAR thresholds were, at the time of implementation, designed to reflect this. The significant adjustments now required have the potential to create challenges around the recruitment of suitably qualified but recently graduated individuals. Graduates often possess knowledge and skillsets that are in demand across Europe. However, as they are at the start of their professional careers, they are generally at the starting point of pay scales. Despite this, earnings for this cohort are much more likely to increase as they develop professional experience, unlike the sub-standard MAR threshold roles which tend to stagnate. Such a concern was raised in several the submissions to the stakeholder consultation, both in terms of the general recruitment of recent graduates and graduate programmes.

Representatives of tertiary education expressed similar concerns regarding the pathway of non-EEA graduates in the State to employment. The recruitment of recent graduates does not seem to have declined relative to other immigration permissions. For CSEPs, recent graduates remain one of the largest cohorts at time of application. Over the last five years, between 20-25% of CSEPs were issued to people with 'Stamp 1G – Recent Graduate' immigration status, meaning they had graduated at some point in the last 24 months.

Stakeholders have, however, highlighted that this cohort, despite having specialised knowledge and skillsets, are typically at the start of their professional life. Consequently, the positions or graduate schemes they apply for may be at the lower end of pay scales but are considerably less likely to stagnate.

There are multiple benefits associated with a lower MAR thresholds for graduates. In the case of third country nationals who have completed their higher education in Ireland, it allows for the retention of skills particularly well suited to the Irish workforce and creates a more accessible pathway for those who have already integrated into Irish life to continue to develop here professionally at the end of their studies. Such graduates are already afforded a 12 - 24 month immigration permission after graduation, provided by the Department of Justice, Home Affairs and Migration's Third Level Graduate Programme.

Regarding graduates transitioning to a CSEP, ongoing analysis by the Department of Finance indicates that this cohort has a lower attrition rate than other CSEP holders. They found that they are more likely to remain in the State in the medium term, after they transition from the CSEP to broader labour market access (Stamp 4). As the CSEP is designed to attract skillsets that are in enduring short supply and encourage long-term settlement in the State, this is a positive outcome.

In order to ensure the retention of the skills developed by third country nationals in Irish tertiary institutions, as well as the attraction of critical skills among graduates, a typically highly mobile cohort, it has been determined that lower MAR thresholds are established for recent graduates, and eligibility to apply for the graduate MAR threshold is restricted to 12 months after graduating.

On this basis it is intended that:

- A lower GEP MAR threshold will be implemented for anyone who graduated from an Irish 3rd level institution with a level 8 or above qualification in the previous 12 months.

- A lower CSEP MAR threshold will be implemented for anyone who graduated from any recognised 3rd level institution with a level 8 or above qualification, relevant to the Critical Skills Occupation being applied for, in the previous 12 months.

The non-EEA national would be eligible for to apply for an employment permit with the reduced threshold at any time within the 12 months after graduating, or, at the point of renewal of the GEP issued during that period. This threshold would also be subject to indexation, rising in line with changes to average weekly earnings in the State.

HEALTH AND PUBLIC SERVICES

Health Care Assistants, Home Carers and Care Workers

The January 2024 increase for these roles was deferred, to allow for Fair Deal contract negotiations and further engagement with the sector. This increase to €30,000 was instead implemented in January 2025.

HCAs are routinely employed in nursing homes and nursing homes are subject to Fair Deal funding, where they negotiate their funding contract with the National Treatment Purchase Fund (NTPF) on, for the majority of employers, an annual basis. Longer lead-in time for changes to the MAR thresholds allows for these increases to be considered as part of the negotiations.

As the rationalisation of the sub-standard MAR thresholds is implemented in the coming years, an advanced-warning approach will be beneficial in the specific context of HCAs, Home Carers, and Care Workers. Q1 CSO data on average weekly earnings is required for the annual indexation review. Preliminary Q1 data is typically available in late Q2 of that year. This preliminary data can inform likely increases required under rationalisation and allow for early engagement between the Department of Enterprise, Tourism and Employment, Department of Health and subsequently the sector on a continued annual basis. This approach provides a reliably scheduled approach to increases, removing sub-standard MAR thresholds on a phased basis. A particular advantage here is this provides the earliest possible information to employers, the NTPF, and the Department of Health, on the scale of increases. Providing a strong basis for contract negotiations, the fair allocation of funding and evidence-based costing for budgetary submissions.

Critical Skills Employment Permits and Public Sector Recruitment

With the provision of health and social care in the State being increasingly reliant on non-EEA recruitment, increases to the MAR threshold should facilitate rather than stymie recruitment for services that directly provide for public good. Increases to the sub-standard MAR rates for some healthcare roles are likely to increase attractiveness. However, if the MAR threshold for CSEPs increases such that public service providers' recruitment salaries were too low to access this permit type[6], this may be detrimental to the recruitment of critical public health and social care workers, particularly evident in the example of nurses. Even baseline indexation will set the CSEP MAR threshold above the recruitment rate for nurses in 2026. Consequently, mitigating provisions are required.

[6] For example, nurses are eligible for a CSEP. The CSEP is attractive because it provides a shorter pathway to permanent residency/free labour market access, has a higher MAR threshold and allows for immediate family reunification.

Table 4: Comparison of Future CSEP MARs vs HSE Nursing Recruitment Salary

Remuneration	Jan-25	Q1-26
Roadmap CSEP	€38,000	€44,000
CSEP Indexation	€38,000	€40,904
Nurse recruitment salary	€38,868	€40,267

The required increase in Q1 2026 will exceed the recruitment salary of public sector nurses. Consequently, in conjunction with the 2026 increases, an exemption from the critical skills MAR threshold, will be implemented for any critical skills role, for which the applicant has a relevant degree, and where the pay is subject to collective bargaining under the public sector pay deal. The same provision will also apply to community and voluntary agencies that have pay agreements linked to the public sector pay agreements.

Public service roles differ from almost every other role for which employment permits are issued, for two main reasons.

1. Public service salaries are principally governed by pay agreements, are set centrally, and are not as elastic as the private sector.
2. While these pay agreements are less flexible, they are covered by robust collective bargaining agreements, containing annual increments on a pay scale, as well as regular adjustments, which mitigates the risk of stagnation or the potential of wage suppression via the employment permit system.

In light of this, all roles that are, on the Critical Skills Occupation List, were the permit holder holds a relevant qualification, and are subject to collective bargaining under the public sector pay deals, are to be exempted from the MAR criteria. This will also apply to the same roles in community and voluntary agencies whose pay agreement is linked to public service agreements.

5. REVIEW OUTCOME SUMMARY

The 2023 Roadmap was intended to implement a longstanding recommendation, that the stagnation of employment permit salaries that had occurred over nearly two decades should be addressed. This recommendation was the culmination of multiple recommendations provided since 2017. The impact of the introduction of sub-standard MAR thresholds alongside the stagnation of the standard MAR rates, was clearly evident across the employment permit system. With the minimum salary of a permit holder stagnating and therefore declining in real terms annually, the number of permit holders able to have their families join them in Ireland was declining in kind. Determining that the minimum salaries had fallen too far out of step with average earnings in the State, indexation was implemented to prevent this in the future. This, however, could not resolve the existing gap, only maintain it.

This stagnation has contributed to an increase in employment permits for lower paid, less highly skilled roles, which has led to an increasing number of GEP holders being unable to avail of family reunification. In order to address these challenges, the rate of minimum annual remuneration must increase faster than the rate of average earnings in the State, as was the intention behind the 2023 Roadmap.

However, just as the €30,000 MAR threshold is very different in the context of 2025, compared to its implementation in 2006, the Roadmap must also be considered in the current context. Additionally, the past year has involved greater than ever engagement with external stakeholders on remuneration. Insights from employers, permit holders, representatives of both groups, and from other government departments have provided constructive and actionable feedback since the first Roadmap increases were implemented.

Due consideration of the potential risks in the medium term, in conjunction with the learnings drawn from significant engagement with external stakeholders over the course of the review, gives a clear rationale for a tempered policy response. This measured approach can still achieve the well-founded policy objectives of the 2023 Roadmap but on a timescale that allows greater time and space for employers to adapt to and absorb the changes, and to protect existing permit holders from any unintended negative consequences.

Therefore, the MAR thresholds will rise in line with the baseline increase to average weekly earnings since indexation has been in effect. However, the sub-standard MAR thresholds should increase in excess of this, to eventually be realigned.

- General Employment Permits MAR threshold will rise by 7.66% in 2026, instead of 14.7%.
- Critical Skills Employment Permits MAR threshold will rise by 7.66% in 2026, instead of 15.8%. and
- Sub-standard MAR thresholds will increase by 9% in 2026 and be phased out over the rest of the decade, by 2030, rather than by 2026.

Additionally, a number of policies in relation to rationalisation, graduates and healthcare workers will be implemented. Namely, lower GEP thresholds for any recent third level graduates from Irish institutions, lower CSEP threshold for recent graduates with critical skills related degrees, and aligning the remuneration of critical public services, to the collective bargaining agreements underpinning these roles.

These provisions will facilitate the attraction and retention of skilled graduates and protect the delivery of vital health and social care services. The implementation plan is summarised below.

MAR CHANGES 2025-2026

Figure 6 – Revised Changes to Minimum Annual Remuneration

Date	Jan 2024	Jan 2025	2026	Jan 2027
GEP & ICT Trainees	€34,000	€34,000	€36,605	TBD
HCAs, Home Carers and Care Workers	€27,000	€30,000	€32,691 89.3% of GEP	92.5% of GEP
Meat and Horticultural Operatives	€30,000	€30,000	€32,691 89.3% of GEP	92.5% of GEP
GEP Irish Graduate	N/A	N/A	€34,009	Index Only
CSEP W/ Relevant Degree	€38,000	€38,000	€40,904*	TBD*
CSEP W/O Relevant Degree	€64,000	€64,000	€68,911	TBD
Critical Skills Graduate	N/A	N/A	€36,848	Index Only
Intra-Company Transfer and Contract for Services	€46,000	€46,000	€49,523	TBD

* Critical Skills roles, subject to the public service pay agreement or linked agreement are to be exempt from this, subject instead to the pay agreement pay scales. This will also apply to community and voluntary organisations whose pay scales are linked to the public sector pay deal.

APPENDIX - CONSULTATION QUESTIONS

Q1. Any personal information, which you volunteer to this department, will be treated with the highest standards of security and confidentiality, strictly in accordance with GDPR. However, please note the following:

The information provided in the submission form may be shared with relevant government departments and State organisations during the review process

The department will publish the outcome of the review and list the submissions received under this consultation on its website

As information received by the department is subject to the Freedom of Information Act, such information may be considered for possible release under the FOI Act. The department will consult with you regarding such information before making a decision should it be required to disclose it

If you wish to submit information that you consider commercially sensitive, please identify that information in your submission and give reasons for considering it commercially sensitive

○ I acknowledge the above

Q2. Name of organisation/representative body/individual/firm

Q3. Contact Email Address

Q4. Are you submitting this response as a(n)

Employer Or Employee/Permit Holder or Employer Representative Body Or Employee Representative Body Or Government Department or Agency Or Other

Q5A. (If per Q4 an employer or employee/permit holder)

How many people are employed in your business/place of work?

10 or fewer / 50 or fewer / 250 or fewer / More than 250

Q5B. (If representative body or govt department)

Approximately how many people are employed in the industry you are representing in this submission?

Answer must be a number

Q6. Please describe the main activity and characteristics of the firm/organisation/sector making the submission (This is not required for Government Department/State Bodies)

Q7. Please provide a brief overview of your sector. Including: importance to the economy; recent and projected growth of the sector; national or sectoral strategies/actions; types of occupations in the sector.

Q8. Please provide details of the types of roles for which you or your members access the Employment Permit System.

Q9. Please provide an overview of the impact of the Roadmap on your sector/members to date

Q10. What are the specific challenges your business/members/sector has faced as a consequence the January 2024 MAR increase?

Q11. Please describe any benefits of the Roadmap on your sector to date. For example, on recruitment and retention of non-EEA workers, improved quality of life in Ireland?

Q12. What challenges do you anticipate you/your business/members/sector will have with future MAR threshold increases as set out in the Roadmap?

Q13. If you have an alternative proposal for the continued implementation of sustainable fair MAR increases for Employment Permit holders, please provide details?

Q14. Are the Roadmap's forthcoming MAR thresholds in line with average wages for Irish or EEA nationals in your sector? If not, please provide further details of average wages for Irish or EEA nationals in your sector.

Q15. Are there any wider economic factors that may have an influence on your ability to meet the future requirements of the Roadmap?