Chambers Ireland Inputs to the National Reform Programme 2023 and the European Semester Process

February 2023

Chambers Ireland, the voice of business throughout Ireland, is an all-island organisation with a unique geographical reach. Our 39 members are the Chambers of Commerce in the cities and towns throughout the country – active in every constituency. Each of our member Chambers is central to their local business community and all seek to promote thriving local economies that can support Sustainable Cities and Communities (SDG 11).

In September 2019, our Network pledged to advocate for and support the advancement of the Sustainable Development Goals. In doing so, we use the Goals as a framework to identify policy priorities and communicate our recommendations, and we have a particular focus on five of the goals encompassing Decent Work and Economic Growth (SDG 8), Sustainable Cities and Communities (SDG 11), advancements in Gender Equality (SDG 5), viable Industry, Innovation, and Infrastructure (SDG 9) and progress in Climate Action (SDG 13).[1] We use these Goals as a lens for interpreting and prioritising our policy proposals.

[1] The Chambers Ireland SDGs. Available at: https://www.chambers.ie/policy/sustainable-development-goals/chambers-ireland-sdgs/

General Overview of Government Response to the 2023 Recovery and Resilience Plan Deliverables

Entry into force of the Climate Action and Low Carbon Development (Amendment) Bill 2021, which provides for the achievement of emissions reduction targets for 2030 as well as the climate neutrality objective by 2050.

Chambers Ireland has welcomed the updated Climate Action Plan and the Carbon budgeting targets out to 2030. However, we are becoming increasingly concerned that the targets are becoming less credible as time progresses, the increasing ambition for these targets and plans is welcome, but we foresee considerable challenges arising as a result of capacity issues. These capacity issues are of two kinds, firstly there is the capacity of the state institutions to deliver on such things as the planning permissions that are needed if we are to be able to deliver such plans and meet such targets[2]. Secondly there is the economic capacity constraints that we see emerging. Already our economy is restricted as a result of capacity constraints. The issue of housing is particularly pronounced, the lack of available, affordable, and appropriate housing prevents Irish firms from growing at the pace which they desire as it is becoming increasingly difficult to find and retain staff, across all skills levels. A consequence of this has been a tightening of the labour market, and we are seeing unemployment fall to historic levels.

In some respects, this is welcome, our sense is that the tightening labout market is, in part, a cause for the increasing workplace participation of women in the Irish economy. It has also catalysed the digitalisation of many businesses that were forced to adapt to covid-era lock-down measures. Businesses are now extending practices such as remote and hybrid working to newer

[2] https://chambers.ie/policy_submision/chambers-ireland-submission-to-the-national-risk-assessment-2023/

employees as a default. This has resulted in increasing wage claims in regional areas and has also led to accelerating housing costs outside of our key cities.

Our view on this is that the housing cost crisis in Ireland has spread from our cities and is now endemic throughout the country. Even prior to Covid, housing had become a major constraint to inward migration, and a significant factor in outward migration. This problem has worsened in recent years and seems unlikely to be resolved this side of 2030.

Given this, Chambers Ireland is concerned about the capacity of the labour force to deliver the significant projects that are in line for investment as part of our National Development Plan, the Climate Action Plan, Housing for All etc. The practice of Government to backload much of the work within these programmes to the late 2020s is to be regretted, as in the absence of an enormous negative jobs shock in the short term, it seems unlikely that these plans will be deliverable within their funding envelopes and existing timelines.

Delays in delivering NDP projects will make Ireland's progress towards achieving Sustainable Development Goals such as Climate Action (SDG 13), Sustainable Cities and Communities (SDG 11), Industry Innovation and Infrastructure (SDG 9), Climate Action (SDG13) increasingly untenable. Similarly, the ambition of the sectoral level carbon budgeting targets for 2030 is welcome, but we believe the attainment of such cuts to carbon emissions to be very unlikely. The mix of cuts across sectors is very uneven, and we believe that what was agreed to lacks credibility. Also, sectors which are significant creators of greenhouse gas, and are largely excluded from the current round of emissions, will be left with an enormous task when it comes to the post-2030 round of cuts as they are likely to account for the majority of emissions (should sectors which have more ambitious targets succeed in meeting them).

Our delays in introducing a planning regime to support offshore windfarms, and the slow pace of upgrading our national electricity Grid also undermine the goal of having 7GW of offshore wind generation capacity in the water out to 2030. A more considered perspective is that, given the current constraints, the ORESS 1 auction projects (circa 2.5 GW of capacity) are likely to be generating energy by 2030.

Establishment of the financial agreement related to the residential retrofit loan scheme.

Chambers Ireland welcomes the progress that has been made in this area, and also the extension of supports, and simplification of process, which is underway to help the commercial sector retrofit their properties. We particularly support the flexibility that has been shown towards conducting shallower retrofits in the residential sector which are more likely to have a greater effect at the margin than a relatively small number of deep retrofits.

It is however increasingly difficult to find contactors that are available to conduct the retrofitting. Supply chain constraints that arose during Covid and the Russian War shock are abating, but costs remain high. The early adopters in this area are useful leaders in terms of demonstrating the value that can be derived from carrying out such works. With energy prices unlikely to abate over the medium term it is likely that the value of carrying out these works remains positive, despite the increased costs.

It is likely that the principal restriction on meeting our retrofitting targets will be labour capacity rather than financing.

Start of rehabilitation work for at least 19 peatland bogs.

We are disappointed with the progress that is being made on peatland rehabilitation, and more generally Life on Land (SDG 15) and Life Below Water (SDG 14) in the past year[3] [4] we have been more active in trying to support the action on rehabilitating our environment more widely. Unfortunately, run off continues to damage our water supplies which is doing considerable harm to out biodiversity, and is also threatening Clean Water and Sanitation (SDG 6). Increased energy costs have slowed the pace of reforms to reduce peat extraction. Local and European Elections next year are likely to result in further avoidance when it comes to facing up to the issue of peat. Also, the Department of Agriculture seems to be extremely reticent to alter their perspective on turning former peatlands into forestry, despite the carbon emissions that are associated with drying peatlands. Furthermore, the primary use of Irish derived wood products are not sustainable carbon sink products like structural components that can be part of the embodied carbon of buildings. Instead, the timber that is produced in Ireland is, overwhelmingly, used for products that have relatively short lifespans such as particle board. There also isn't a facility which would allow Irish woodland to be used to offset carbon created by other means. We could make considerable progress in terms of carbon reductions, biodiversity, and the protection of our water sources if we were to facilitate the use of forestry as a service, rather than as a supply of cheap, low-grade lumber.

Connection of at least 990 primary schools to high-speed broadband networks.

We welcome the progress that has been made in connecting schools to broadband networks, and with the development of Computer Science as a subject of second level education, we believe

[3] https://chambers.ie/wp-content/uploads/2023/02/Chambers-Ireland-Submission-on-the-National-Biodiversity-Plan-Consultation.pdf

[4] https://chambers.ie/wp-content/uploads/2023/02/Chambers-Ireland-Submission-to-the-Department-of-Agriculture-Food-and-the-Marine-Regarding-the-Consultation-on-the-Draft-Forest-Strategy.pdf

that this will support the Quality Education Goal (SDG 4), and in the longer-term Decent Work and Economic Growth (SDG 8). A concern that we have is regarding the capacity of the teaching cohort to build competency in this area to the extent that is needed to usefully embed skills within the student cohort.

Raising the number of graduates with high-level ICT skills.

The main difficulty that we see in this area is with the retention of high-level ICT skill students within the third level sector, for this we see the need for progress at the leaving cert level Computer Science level so that students will have the grounding the need to succeed at third level. Again, success here will support the Quality Education Goal (SDG 4) and, over longer time frames, Decent Work and Economic Growth (SDG 8) but it will take considerable time to deliver. The greater challenge in the short run is in facilitating the upskilling of those that are in employment, or seeking it, and regarding this we propose that the Department of Further and Higher Education provide people who are in the labour market with flexible training vouchers that they can use to upskill, reskill, or refresh their skills, to avoid the perils of underemployment.

Application of the SME test (which asks policy makers to consider the potential burden proposed regulations or legislation place on SMEs) by at least five government departments.

There was an extremely poor application of the SME test in 2022. Many policies which disproportionately targeted service industry employers (such as sick-pay, living wages, the Work-Life Balance act, Transparent and Predictable Working Conditions Directive etc.) were introduced simultaneously without regard for their impact on employers. Individually, all of these policies are of value, but their implementation was uncoordinated and ad hoc. Similarly, we saw the Auto-Enrolment pension policy go into hiatus for a period of years over Covid, only for the heads of bill to be delivered before Christmas with little to no consultation since the original strawman proposal and formed. It seems as though the heads of bill are designed so that autoenrollment policy is coherent with existing Department of Social Protection policies, rather than the second order effects it is likely to induce in the workplace.

Expansion of the Anti-Money Laundering Compliance Unit’s enforcement toolkit with financial sanctions.

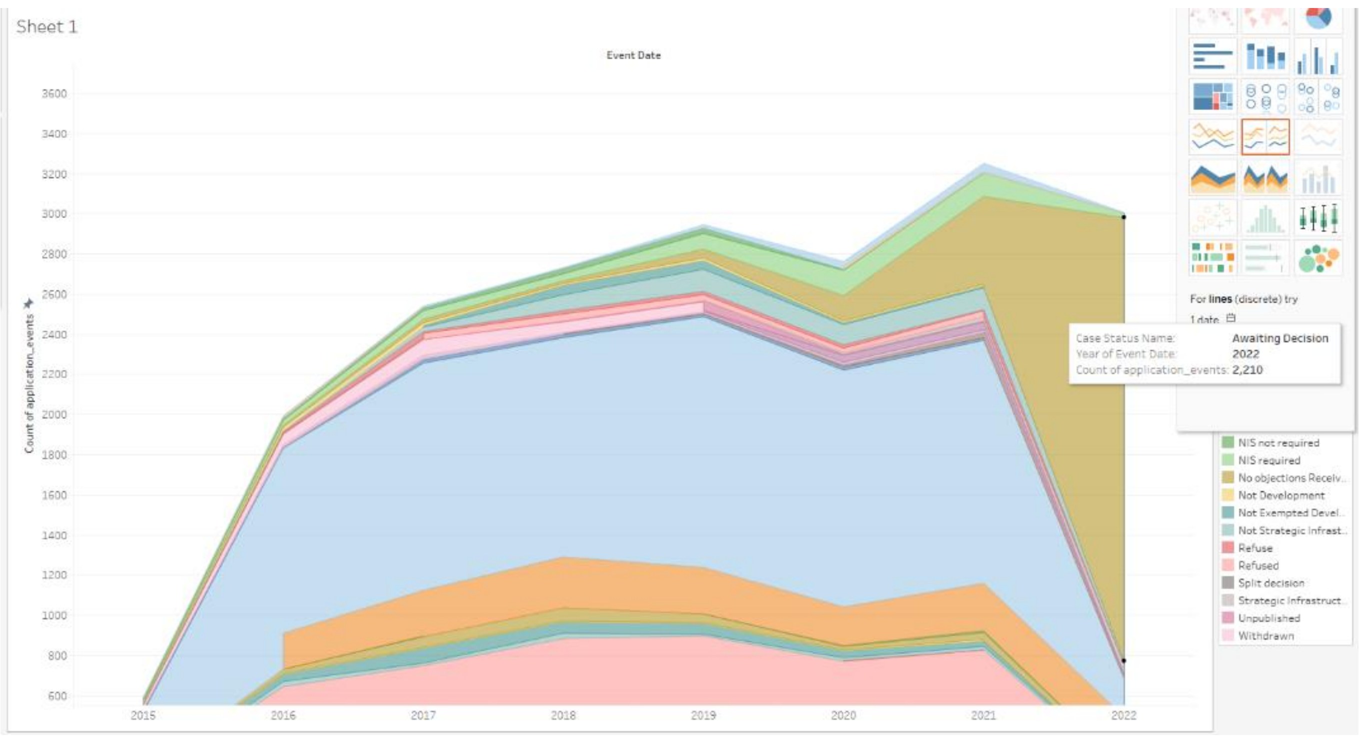
This is not an area which we are against, but as ever it seems to be operating within an isolated silo where its activity is not adequately coordinated with the likes of the Department of Communication’s National Cyber Security Centre, the Department of Defence etc. As is common, it seems as though the Anti-Money Laundering Compliance Unit’s role is to ensure compliance with a directive (as opposed to supporting the aims of the directive).

The Broader View

Taking a broader view on the National Reform Programme, beyond the specific recommendations for 2022

On Housing and Infrastructure

Our planning system is in crisis. As of January 1, 2023, of the 3008 cases which were put before An Bord Pleanála in 2022, 2,210 were awaiting decision.



This is an unprecedented situation. While the problems within An Bord Pleanála were not as well know as they are today, the slow pace of decision making within the Bord was increasing apparent (over the period between 2016 and 2022 the average time it took to close a case within An Bord Pleanála increased by more than 50%, from 137 days in 2016 to 208 in 2022), but this is really an undercount as there is an enormous backlog of cases that haven't reached the point of a decision having been made.

This constraint is likely to severely impact our capacity to build housing, and so is a significant risk to the wider economy. With our high rates of employment, the significant increase in people seeking international protection, and the need for immigration to help us deliver our National Development Plan and Climate Action Plan projects, it is apparent that the Housing for All goal of in excess of 300,000 housing units completed within the next ten years will be insufficient to meet our needs.

It is also likely however that our planning system is simply not sufficient to facilitate these inadequate ambitions.

Government have revised Climate Action Plan and have increased pace of decarbonisation that is required of various sectors with the aim of meeting in light of tighter 2030 limits on greenhouse gas emissions. However, we are not making the progress we need if we are to support an effective offshore renewable energy planning regime that can help us meet the full potential of our national renewable energy resources.[5] Unless we succeed in decabonising our electricity system we will find it almost impossible to meet our 2030 carbon targets, it is at this point extremely difficult to see a path towards meeting our emissions targets.

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[5] Chambers Ireland white paper on maximising the benefit of developing the national wind energy industry and the national grid | December 2020 https://www.chambers.ie/wp-content/uploads/2021/01/Chambers-Ireland-white-paper-on-maximising-the-benefit-of-developing-the-national-wind-energy-industry-and-the-national-grid.pdf

On Skills and the Labour Market

The expansion in the capacity and range of courses that are on offer to both those that are in the labour force, through services such as Solas, Springboard, and Skillnet are all welcome and will hopefully continue into the future. The shift to remote working has continued to support very welcome increase in female labour market participation and it is hoped that this change will become secular. Retaining the skills of women who have been excluded from the workforce will be an important source of economy growth into the future.

However, no process is entirely positive, while the impact of remote working is lessening in urban areas as businesses adapt to the change in customer behaviours the housing problems in our urban areas have been transmitted to regional areas. Price differentials have declined between our cities and our regional areas. Increased competition for talent is affecting businesses based in regional areas, as employees are able to remote work for higher wages. This is also undermining some of the business models that were based around allowing workers to go remote only, in compensation for lower wages and a better work life balance. The competition for skills has skewed the power dynamic towards highly skilled employees. An unforeseen effect of this is the driving up of housing costs in regional areas. This is likely to have a significant effect on the digitalisation agenda where regional based firms will be challenged to compete with urban firms for roles that involve nonphysical activities including administration, bookkeeping, accounts coding, data analysis etc.

On Energy Business Supports

Throughout the pandemic, Government was quick to implement policies that supported businesses and employment that were suffering as a result of liquidity crises that were caused by the necessary public health restrictions. Considerable resources were successfully directed at SMEs and Microbusinesses to help them introduce online activities into their core business. A business representative organisation such as Chamber Ireland could only applaud Government when it treated our members so generously. We had hoped that the experience of the Covid pandemic would be sticky and would force a change in the practice of governance. That this did not happen is demonstrated by the failure of a policy like TBESS. The lessons that we should have learnt during covid; that supports are only effective when they are accessible, and targeted at sectors that are vulnerable but viable was forgotten. Instead, we had a scheme that was available for everyone, but with such constraints put on it that it was useful to no one.

On Taxation

Our tax receipts have expanded considerably over recent years. Particularly after the OECD's BEPs process commenced. This extra revenue greatly strengthened the Government's freedom of action during the pandemic and was welcomed. Our decision to align with the OECDs framework for international tax reform gives certainty to businesses and remains broadly welcomed by our Network's[6]. However, the concentration of Corporation Tax receipts in a small number of very large multinational corporates continues to undermine the robustness of our national economy.

The increase in Income Tax receipts is another area of weakness, because of the extremely progressive nature of Irish income taxes, this means that a small proportion of the population account for the majority of income taxes. In the event of an economic downturn, particularly one that affects core FDI sectors such as Pharma, ICT and Medtech, it is likely that we will see a

[6] Chambers Ireland Submission on the OECD International Tax Proposals | September 2021 https://www.chambers.ie/wp-content/uploads/2021/09/Chambers-Ireland-OECD-International-Tax-Proposals.pdf

correlated downturn in both Income Taxes and Corporation Taxes at a point when there will be significant demands placed on the Exchequer. Our economy needs to diversify its activities if it is to address such a vulnerability. While Ireland has escaped the worst of the cutbacks within the ICT sector to date, this has demonstrated that there is a strong correlation across businesses within that sector, and so there is correlated risk for the state. We remain very vulnerable to being impacted by alterations to the domestic US tax code. This is a problem which has become amplified over the recent years of crisis as state bodies have become increasingly reliant on infusions of Corporation Tax receipts to deal with immediate crises. Should the next crisis impact Corporation Tax receipts it is difficult to see how the impact will not be very grave for the state.

Our dependency on Corporation Tax and Income Tax is likely to expand over coming years as a direct result of decarbonisation. Approximately 8% of government revenue is derived from Excise Duty, Motor Tax, Carbon Tax, Vehicle Registration Tax, and associated Value Added Tax that is derived from the use of internal combustion engine vehicles. Should they be phased out over the coming decade this will narrow the tax base further, it is not yet clear how such a revenue gap will be made up. This will also have a great effect on Local Government fund, which is the main beneficiary of Motor Tax. The failure to expand Local Property Tax as a revenue generation mechanism for local government is another weakness. As a result of our local government budgeting process, our members are forced to subsidise weaknesses in local government funding through commercial rates. The levels of Commercial Rates which our members experience are a consequence of local governments setting budgets separate to the decisions they make to raise revenue. The persistent decoupling of local government expenditure from the setting of Local Property Taxes and Commercial Rates continues to undermine Local Governments and their activities.

Energy Concerns

Even before the Russian invasion of Ukraine, energy was an area where Ireland had a competitive disadvantage relative to our peers. Energy in Ireland was relatively expensive and last year we warned that "unless there is a significant change in how we source our energy that is likely to remain the case, particularly if geopolitical concerns continue to amplify the volatility in pricing." Those fears were quickly proven to be correct.

Our Network has concerns that while there are earnest targets associated with introducing renewable energy to our electricity network, inadequate regulation and planning procedures coupled with a lack of grid capacity may prevent us achieving those aims. Furthermore, novel technologies such as Green Hydrogen and Green Ammonia are coming closer to market. These technologies will play a significant role in helping Ireland and the EU decarbonise. It continues to be vital for both Climate Action (SDG13) and our economy that no part of the regulatory apparatus of the state prevents the development of these industries (in the same way as the lack of a planning regulatory regime has prevented the development of an offshore renewable energy industry to date).

Unfortunately our concerns about the capacity of our planning authorities have increased over the last twelve months, we are also deeply concerned by the views offered by Department of Housing official at the recent Wind Energy Ireland conference that signal a shift away from the developer led approach for the offshore energy planning regime and towards a centrally planned model. This is especially concerning given the poor communication, the lack of stakeholder engagement, and the virtual absence of technical capacity within the department (in terms of the multi-disciplinary teams that are essential to delivering planning decisions that are robust enough to survive their inevitable scrutiny in the courts.)

Even discounting that enormous, and unheralded, shift in policy, the present plans are insufficient to meet our targets because there is no recognition of the risk of undershooting. If our target really is 7GW of offshore wind energy then we ought to be opening auctions for at least 11GW in the knowledge that some of these projects will be delayed, but a with a broader array of projects in the pipeline, a sufficient number of them will be completed in time to help us meet our targets.

If we are only planning 7GW, and the 2GW of dedicated Green Hydrogen doesn't yet have a route to planning, and the 2.5GW of ORESS 2 are threatened by the Department improvising maritime planning policy, then it seems credible that we will only have 2.5GW in the water by 2030.

Should we lack this generative capacity, then it is very hard to see how we will be able to meet our other climate aims. On balance, and given the lack of action, and the increasingly precarious decision making capacity of the planning authorities, this suggest that Ireland's Climate Action (SDG13) policy may be moving in reverse.

Ireland should have an agenda where we are attempting to capture the maximum amount of renewable energy available to us, and couple that with a long-term energy storage solution (such as hydrogen). Such a policy would allow Ireland to become net energy exporter and help facilitate the decarbonisation of continental European states.

The current trajectory of policy suggests that we will fall short of that potential and we are unlikely to make the progress we could make to achieve Affordable and Clean Energy (SDG 7).

Competitiveness Concerns

Businesses, both those operating in the domestic economy and also those in the trading economy, have experienced significant challenges and burdens arising from increased costs including staffing, energy and inventory. Volatility is widespread across many markets and given the impact of Russia's war on Ukraine is likely to continue to be persistent.

As we know from work conducted by the OECD[7] the most effective way for Irish firms, and particularly SMEs, to improve their productivity is to enter into the value chains of internationally trading firms. There are two routes to that end.

Firstly, more Irish firms need to trade with a wider range of businesses across a broader number of countries, and this will help limit the geopolitical risk that the Irish economy is exposed to. To accomplish this, supports for businesses that seek to trade should be extended to firms other than high-potential start-ups if we are to make progress at improving the productivity of our domestic, non-trading, SME sector, as was facilitated by Chapter 9 of the Commission for Taxation and Welfare's report[8], but was editorialised out of existence in the Executive Summary.

Secondly, more needs to be done to breakdown the Chinese wall between domestic firms and the multi-national corporations which are based in Ireland.

With continued private sector growth expected into the medium term, and with a significant reallocation of the workforce to more productive sectors having occurred during the Covid pandemic, and with an enormous level of state investment planned (between the National

[7] Developing innovation capabilities: https://www.oecd-ilibrary.org//sites/66472c4f-en/index.html?itemId=/content/component/66472c4f-en#boxsection-d1e26322

[8] https://assets.gov.ie/234316/b4db38b0-1daa-4f7a-a309-fcce4811828c.pdf

Development Plan and the Housing for All strategy) it is likely that Irelands labour force supply will continue to tighten in the coming years. Hence, Irish labour costs will increase over the 2020s. This is likely to lead to increased migration from other EU states which will put further strain on the housing market, particularly in the rental sector.

The Sustainable Development Goals

The five Sustainable Development Goals[9] that are most relevant to our Network's members are:

Sustainable Cities and Communities (SDG 11)

Climate Action (SDG 13)

Gender Equality (SDG 5)

Decent Work and Economic Growth (SDG 8)

Industry, Innovation, and Infrastructure (SDG 9)

It would be unfair to consider the Government's accomplishments over the last three years with an economy that wasn't dealing with Covid, and Brexit, and supply-chain shocks, and inflation, and an energy crisis and yet we must.

Many of the problems that we face in Ireland arise out of the culture and practices that underly how we operate our state bodies and state institutions. The reactive approach where we attempt to muddle through problems without developing the capacity and culture to prepare for known challenges in advance is a significant national risk. Furthermore, the continued siloing of political and departmental responsibility into discrete areas suggests a deeper misunderstanding of the nature of the challenges our state faces, insofar as any significant problem we face will be multi-factorial and complex. It is in the nature of simple problems that they can be resolved. The complex ones that persist as threats at the state level are interwoven with each other and compound each other.

[9] we do not order them in terms of priority

What Chambers Ireland sees as the great strength of using the Sustainable Development Goals paradigm is that it facilitates analysing how policies interact, affect, confound, or amplify each other. Unfortunately, we see little evidence that this is being internalised in the culture of state policy.

Chambers Ireland's baseline assessment is that Ireland is unlikely to accomplish the Sustainable Cities and Communities Goal (SDG 11), the Climate Action Goal (SDG13), nor the Industry, Innovation, and Infrastructure Goal (SDG 9). However, our view is that Ireland is, all things being equal, likely to continue to make progress towards the aims of the Decent Work and Economic Growth Goal (SDG 8) and the Gender Equality Goal (SDG 5).

In recent years, the focus of Government has been directed towards the immediate crises. It is looking increasingly likely that many crucial decisions have been deferred to a point where they will not be made until after the next general election. These deferrals have made it unlikely that significant progress towards the Sustainable Development Goals will be attained.

For example, the funding which is being provided for town centre living is inadequate and is not sufficient to make significant differences to our town centres. Unless our town centres become attractive places to live and work, Ireland will not make significant gains on Climate Action (SDG13) goal, Sustainable Cities and Communities (SDG 11).

Building Sustainable Cities and Communities (SDG 11) is a Climate Action (SDG13), but it is also one that is founded in Industry, Innovation and Infrastructure (SDG 9). The reason why Chamber Ireland cares about housing is because the existing housing crisis hurts our members by hurting their staff. It is increasingly difficult to find staff that are willing to move to Ireland from abroad, meanwhile the staff that are here are either in a yearly productivity-crushing cycle of increasing rents and changing homes, or they are emigrating.

Ireland's attainment of Climate Action (SDG13) is reliant on decarbonisation and our success here is entirely reliant on the decarbonisation of our electricity networks. As we have pointed out previously, achieving that aim is a function not of political will, or financing, but rather our planning processes. 2022 was a terrible year for our planning authorities. Chambers Ireland's concern that Government will seek to by-pass planning problems through enacting legislation for a new Judicial Review system is coming to pass. We reiterate our view that this will put the right to a Judicial Review in conflict with constitutional rights and Aarhus Convention rights. A decision to legislate such a solution will inevitably see the revised planning legislation act challenged through the Supreme Court and the European Court of Justice. Even if the planning bill, when it is completed, is well crafted, this legal process of challenging it will delay developments and infrastructure related to housing and Climate Action (SDG13). As a consequence, projects which rely on the new planning act's Judicial Review powers are unlikely to be completed before 2030. Our Network argues that it would be far more useful to continue the process of upskilling and resourcing our planning agencies (throughout every level) and also by created a dedicated Environment and Planning Court that could treat infrastructure and housing with the importance that it deserves.

Sustainable Development Goals Assessment

Sustainable Cities and Communities (SDG 11)

On Sustainable Cities and Communities (SDG 11), Chambers Ireland's assessment is that we are less likely to accomplish this goal than we were in 2022. Specifically, the planning system undermines Housing for All, and the lack of ambition for Town Centre First will result in too little action to see the kind of progress that our urban areas need.

Climate Action (SDG 13)

On Climate Action, Chambers Ireland's assessment is that we are less likely to accomplish this goal than we were in 2022. The significant downside risks regarding the planning system that we highlighted last year have proven to be correct. It is hard to outline a credible path to meeting our 2030 targets.

Gender Equality (SDG 5)

On Gender Equality (SDG 5), Chambers Ireland's assessment is that we are as likely to accomplish this goal as we were in 2022, and that there continues to be significant upside risks. We do not yet know what the full impact of remote working will be for women, but as the national conversation shifts towards flexible working it is likely that more opportunities will emerge for women regardless of where they are, or what point they are at in their lives. We are neutral on the childcare issue, relative to 2022.

Decent Work and Economic Growth (SDG 8)

On Decent Work and Economic Growth (SDG 8), Chambers Ireland's assessment is that we are more likely to accomplish this goal than we were in 2022, and that there are significant upside risks. The 2020's are likely to continue be a good time for employees relative to employers, our significant concern – with respect to labour force developments – continues to be that there will be a skills shortage which will inhibit Irelands economy growing to its fullest potential.

With Decent Work and Economic Growth (SDG 8) there have been many gains particularly around upskilling and retraining, but childcare issues remain pronounced.

Industry, Innovation, and Infrastructure (SDG 9)

On Industry, Innovation and, Infrastructure (SDG 9), Chambers Ireland's assessment is that we are less likely to accomplish this goal than we were in 2022, and there are significant downside risks. Planning continues to be the problem. We are not convinced that the administrative, planning, and judicial systems are capable of delivering the degree of infrastructure development that the National Development Plan demands. Concerns about security of electricity supply are already leading to FDI focusing on other jurisdictions.