



Open, rules-based and digital trade to drive competitiveness

November 2023

**A Stronger Europe,
Stronger Ireland
Initiative**

An EU that is open for
trade and investment



Effective strategic autonomy must include a commitment to openness. Open, rules-based and digital trade are key to competitive, resilient and sustainable Irish and European economies.



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Introduction

Trade and the ability to attract investment are among Ireland and the EU's most powerful assets, and at the core of economic prosperity and competitiveness. In a period characterised by recovery from the Covid-19 pandemic, the Russian invasion of Ukraine and the consequent energy and inflationary impacts, challenges to global supply and value chains are substantial. Concurrent with this geopolitical upheaval, the EU is embracing two transformative economic developments: the transition to climate neutrality and the advancement of the digital age. In this new phase of globalisation, it is paramount to safeguard an open, competitive and sustainable trade environment. To this end, the EU must be careful in reshaping its trade policy in line with the concept of open strategic autonomy: combining international leadership and engagement with like-minded partners to ensure open markets with a robust defence of values and interests. We must ensure that the EU continues to be seen as a choice location for trade and investment.

Central to this objective is that **effective strategic autonomy must include a commitment to openness.** It is due to openness that the EU is the world's largest trader of goods, agricultural and manufactured, and services. Trade is intrinsically linked to investment, and the EU must remain open if we are to advance our position as a top provider of, and global destination for, foreign investment. The EU must champion rules-based and digital trade with European and global partners, and continue to be open to foreign direct investment to support competitive, resilient and sustainable European economies.

Urgent action is needed at EU and global level, as the multilateral trading system remains at risk. The EU should strongly advocate for the multilateral rules-based system, recognising that close to 60% of EU trade takes place under World Trade Organisation (WTO) rules and tariffs. The EU must work with major trading partners to achieve a **reformed WTO that secures a rules-based system promoting openness and competitiveness.**

New and diversified bilateral trade agreements are also key instruments for the EU's security, resilience and prosperity. Current and future trade agreements should be flexible to adjust to the twin transitions of climate neutrality and digitalisation, and effective implementation is paramount. Bilateral partnerships are also increasingly seen as powerful tools to support human rights and climate objectives.

Developing a new trade partnership with the UK is still a work in progress following its decision to leave the EU. Better and more stable EU-UK political engagement

provides the opportunity to implement the Windsor Framework and develop relations under the EU-UK Trade and Cooperation Agreement. For economic prosperity and social cohesion, it is essential that we get this right from both an Irish and EU perspective.

EU-US trade and investment relations remain central pillars of the world economy. Ireland and Irish business have made, and continue to make, important contributions to securing positive transatlantic relations. Improved EU-US relations in recent years are a step in the right direction but more remains to be done. The transatlantic partners need to jointly identify risks, but also need to develop opportunities and set standards for future trade. They should work together on timely WTO reform and on engagement with other international bodies such as the OECD. The potential of EU-US Trade and Technology Council must be maximised to support trade and investment, including permanently removing tariffs and barriers.

To ensure prosperity and security along **global value and supply chains**, the diversification of export and import markets is essential. A comprehensive and dynamic Economic Security Strategy and economic de-risking are necessary to address dependencies and develop capacities to ensure a resilient and sustainable supply of critical raw materials for the green and digital transitions.

Digital trade is increasingly important for Ireland and the EU and is intricately linked to Europe's transition to climate neutrality. Global digital trade is growing exponentially, outpacing exports of goods and other services. Regulatory harmonisation is necessary to streamline free cross-border data flows necessary for enterprise competitiveness and innovation.

Ibec and Irish business are clear on what is needed to enable business and the EU institutions to work together to reach our common goals of economic stability and growth. This will involve addressing climate change, advancing the digital transition and sustaining a stable and open trade and investment environment. Working together the EU and the business community have the opportunity to take the right policy options to make a real difference to economic and social development both at European and global level. Our future economic fortunes continue to demand an outward-looking, dynamic and successful EU. One that embraces change and is aligned with the needs of business and citizens. Prioritising open and rules-based trade that is directed by the concept of open strategic autonomy to deliver huge economic and social prosperity for businesses, workers and citizens.

1

Create a reliable and trusted multilateral trading system

Ensure effective and rules-based trade for the benefit of all

Effective WTO reform is critical for free and fair rules-based trade

Reliable and trusted global multilateral systems underpin Europe's competitiveness and security. The Covid-19 pandemic, and more recently the Russian war against Ukraine, saw countries all over the world increasingly taking unilateral protectionist actions. This is dangerous as it undermines multilateral rules and the WTO.

The importance of the WTO in the multilateral trading system cannot be understated. Its rules govern a large portion of world trade and it brings more countries together than any other forum to discuss trade. The cost of trading services is twice as high as trading goods. OECD data indicates that the WTO's Joint Initiative on Domestic Services Regulation agreement could generate an annual trade cost savings of USD 150 billion for participants and WTO members. Effective WTO reform is critical to advance and to achieve the commitment and effort of all its members. It is essential that Europe now stands by the core principles of open and fair rules-based trade.

Multilateral rules must be updated and ensure a level playing field

Despite some positive outcomes from the last WTO Ministerial Conference (MC12), the multilateral trading system remains at risk. Current multilateral rules are not up to speed with the most recent developments in international trade, and do not cover many relevant areas. This impacts enterprise activity globally as the lack of rules leads to trade and investment barriers. Adopting ambitious digital trade and intellectual property policies requires innovation and multilateral support. In the context of the WTO TRIPS Agreement, multilateral rules on Intellectual Property (IP) protection must be abided by.

The absence of a functioning dispute settlement system and a shared objective to agree on new avenues for further market liberalisation and horizontal rules makes it difficult to fight increasing unilateralism and protectionism, as well as ensuring a level playing field.

The EU must continue to support rules-based global systems as it seeks to reenergise the WTO. Building on the experience of the WTO negotiations for an Environmental Goods Agreement, the EU approach will have to be based on measurable, transparent and functioning international standards (e.g. palm oil), avoiding reliance on a patchwork of overlapping or potentially conflicting standards that are not applied in practice.

Recommendations to Irish and EU policy makers

Continue to fully support the rules-based system, while making use of the flexibilities provided for under WTO rules where appropriate and on a case-by-case basis.

Commit to timely and effective WTO reform, and use membership to its full potential by working to develop and strengthen effective multilateral institutions. Increased transparency, improved monitoring and negotiating functions are essential.

Avoid excluding a priori non-Most Favoured Nation (MFN) plurilateral arrangements in key areas, e.g. those related to sustainability or state subsidies, where results are not achievable within the WTO framework and companies competing globally cannot count on a level playing field.

Use the EU's **Trade Defence Instruments** more effectively, while ensuring that their application is in accordance with WTO rules.

Keep multilateral rules on IP protection in the context of the WTO TRIPS Agreement.

Achieve meaningful progress in joint statement initiatives e.g. e-commerce. This work is critical for the modernisation of the WTO and for the continuation of progress on 21st century standards.

Develop a more structured dialogue between the WTO and the business community to modernise the rulebook and make it even more reflective of businesses' realities.



2

Renew the transatlantic partnership

Advance the revitalised transatlantic relationship to promote a positive global trade agenda

The EU and US must find permanent solutions to shared challenges

Transatlantic trade relations are a central pillar of the EU's economy. European and American economic operators face similar challenges when it comes to market distortive practices generated by non-market economic policies and practices.

The EU and the US have made significant progress in key areas and achieved important results in long-standing disputes in the past. Work needs to intensify to find more permanent solutions that require further cooperation on trade, competitiveness, overcapacity, subsidies and sustainability issues.

Engaging in shared fora such as the EU-US Trade and Technology Council is crucial

Since the adoption of the U.S. Inflation Reduction Act there have been intense discussions regarding its impact on the European economy. There are concerns as to what extent it would pull investments away from Europe, threatening the long-term competitiveness of its green and low-carbon manufacturing industry as well as enabling sectors. During ever-changing geopolitical and arising trade conflicts, the EU should be at the forefront of advocating for open trade, investment and timely dispute settlement.

The EU-US Trade and Technology Council (TTC) should serve as a forum for transatlantic partners to jointly identify risks, discuss where to impose controls and how to effectively prevent regulatory arbitrage. The EU-US Summit in October extended the deadline to find a transatlantic agreement on a long-running dispute over steel and aluminium to the end of the year. At the conclusion of the summit, EU and US leaders adopted a joint statement, which includes a roadmap to underpin and further strengthen the relationship for years to come. Continuous engagement via the TTC and EU-US summits are key in promoting and achieving measurable results, including a permanent solution on aircraft subsidies and related tariffs. The TTC is also an opportunity for the EU and US to work together to identify opportunities and set standards for future trade.

Recommendations to Irish and EU policy makers

Address non-market economic policies and practices through **multilateral rules and the WTO**.

Coordinate to avoid unilateral actions to address market distortions that may negatively affect each other's businesses.

Work to reduce the costs of doing business with the US and ensure a balanced relationship with China that takes into account the increasing risks while remaining engaged.

Find permanent solutions for non-tariff barriers and long-standing trade conflicts e.g. steel and aluminium, aircraft subsidies.

Maximise the potential of the **EU-US Trade and Technology Council** on trade and competitiveness.

Intensify the use of free trade agreements and mutual adequacy decisions as a vehicle to safeguard and promote further bilateral digital trade and cross-border data and service flows.

Define ways to increase European coordination and exchange of information on export controls and sanctions with like-minded partners.

Negotiate a framework for mutual recognition of conformity assessments. This remains a priority for highly regulated sectors, both traditional and emerging.



3

Promote a positive trade agenda to maximise market access

Enable international partnerships characterised by openness

Trade agreements should be flexible and dynamic

Open and diversified trade makes the EU more prosperous, competitive and resilient. Free, rule-based and fair trade is a prerequisite for the EU's security and prosperity. Bilateral trade agreements are a key instrument to create economic opportunity, ensure legal certainty and diversify both import and export markets. Existing trade agreements should be implemented effectively, including better take-up and use of these agreements by businesses. Current and future trade agreements should be flexible and dynamic to meet the challenges of digitalising and decarbonising the economy and to avoid potential future barriers to trade.

Establish other forms of bilateral partnerships to support EU objectives

The EU should continue to build bilateral partnerships, not only through free trade agreements but also through arrangements establishing cooperation with partners on issues of mutual interest such as the EU-India Trade and Technology Council, digital trade rules with partners in Asia and critical raw materials partnerships. The EU can also utilise trade policy to support other EU objectives such as promoting higher sustainability standards, respecting human rights and fighting climate change by giving trade partners more privileged access to our market, for instance through agreements such as the recently concluded EU-Kenya Economic Partnership Agreement or the Generalised System of Preferences. The EU should show openness, ranging from information exchange to concrete support that helps third countries adapt, including through reasonable transition periods. This will increase acceptance and compliance with the new EU legal frameworks that set more ambitious sustainability standards.

Shape global Intellectual Property rules and initiatives

The EU has the objective of becoming the world's IP hub and has an important role in influencing the shape and direction of global IP initiatives. IP harmonisation, specifically concerning patents, will result in a changed but improved system for all users. Europe, through the European Patent Office (EPO), the EU Intellectual Property Office (EUIPO) and other stakeholders, will have a key role in delivering an effective system. It should be recognised that European stakeholders have a considerable track record in this regard. For example, the new unified patent system will be developed on a hybrid model grounded in the best of common and civil law traditions. It must also be recognised that IP licensing activity is increasingly global, with efficient and effective regimes influencing outcomes elsewhere. This is far bigger than an EU Single Market issue.

The EU must champion greater harmonisation efforts and avoid further fragmentation of a complex economic area through initiatives such as the Standard Essential Patent proposal. The European Commission must be committed to working with other territories on the adoption of complementary regulations leading to an internationally harmonised system. IP harmonisation, such as Single Patent Law Harmonisation, would have a considerable impact on future trade agreements. It would provide upfront certainty on patent-related matters, freeing negotiators to focus on other areas and reducing the potential of patent-related disagreements from derailing the process. For Ireland and the EU, this could be beneficial to future trade talks with the US, UK and elsewhere.

Recommendations to Irish and EU policy makers

Relations between the UK and the EU have improved in the aftermath of the **Windsor Framework**, creating a steadier base to advance effective implementation of the various components of the **EU-UK Trade and Cooperation Agreement**. The introduction of new pieces of legislation should be monitored to assess divergence from EU law and the potential impact on competition and the level playing field.

Concluded EU trade agreements, e.g. with New Zealand, should enter into force during this institutional cycle and ongoing negotiations, e.g. with Australia and India, should accelerate and be concluded as soon as possible.

The **EU-Community of Latin American and Caribbean States (CELAC)** summit in July 2023 gave new impetus to the conclusion and ratification of agreements with Chile, Mexico, and Mercosur to strengthen mutually beneficial links. This summit was also an opportunity to build stronger partnerships and investment ties through the Global Gateway in key areas like critical raw materials, clean technologies and digital connectivity.

Promote sustainability objectives through connecting market liberalisation in trade agreements to the fulfilment of certain sustainability criteria, or through the introduction of “minimum sustainability standards” based on measurable, transparent and well-established international conventions.

Champion **greater EU harmonisation** efforts and avoid further fragmentation of a complex economic area and **take a leading role in influencing the shape and direction of global IP initiatives**.

Alongside broadening the spectrum of trading partners, there should be a greater focus on the enforcement and implementation of existing agreements.

Assessment of the impact on European competitiveness is necessary before introducing new export controls. European and international coordination and consultation with the private sector is critical to avoid market fragmentation and improve legal certainty for companies.



4

Develop resilient and diverse supply chains

Safeguard sustainability in global value chains

Global value chain uncertainty must be mitigated to help business

Supply chain disruptions have declined as China reopens to the world and Europe diversifies its energy supply away from an overdependence on Russian gas, in the context of the war on Ukraine. However, European businesses continue to contend with global value and supply chain uncertainty and diversification of both export and import markets is essential.

Supply chain resilience, trade diversification and economic security are key components of open strategic autonomy

In view of growing geopolitical risks, companies are assessing their exposure to certain markets, mitigating risks and reorganising supply chains. Security objectives are increasingly determining political decisions superseding economic interests. It is important that action is evidence-based and that national security concerns do not lead to unnecessary protectionist actions. The expansion of informal alliances and strategic partnerships with third countries is important for reducing overdependencies and promoting higher sustainability standards along global value chains. This will help strengthen supply chain resilience and diversify trade, which must be a central element of the EU's Economic Security Strategy and open strategy autonomy. A secure and stable supply of critical raw materials is an important driver of resilience, which is crucial both in the short-term to deal with crises, as well as in the long-term to address dependencies and develop capacities. Critical raw materials are essential for the green and digital transformation of European industries. However, their supply for net-zero technologies may be one of the most obvious examples of Europe's overdependence on third countries as 98% of the EU's rare earth supply comes from China, with whom the EU should pursue a policy of economic de-risking, not de-coupling. The EU's Net Zero Industry Act (NZIA) is a key tool to reduce strategic dependencies on third countries to boost innovation and net-zero competitiveness to compete with industry in China and the USA.

Openness and accessibility are crucial for sustainable value chains and ensuring a resilient supply of critical raw materials

Trade and investment have the potential to enable a just transition and sustainable development. Capacity building, trade facilitation and close dialogue with developing countries is key to strengthening global trade and investment relationships, in line with the Sustainable Development Goals. Informal alliances and strategic partnerships must be characterised by openness and remain accessible for developing countries who are crucial players in supply chains, especially for critical raw materials.

Supports need to be targeted and customised to respond to the specific needs of individual developing economies. Developing countries need to be actively involved in global discussions that impact them. It is vital that the EU seeks mutually beneficial partnerships with emerging markets and developing economies through the Global Gateway strategy.

Recommendations to Irish and EU policy makers

A comprehensive and dynamic **Economic Security Strategy** must be informed by a credible and thorough assessment of risks and be based on market-driven diversification, ambitious trade and investment agreements, and coherent EU policies to attract investment, facilitate production and foster competitiveness in Europe.

While the principles inspiring the European **Critical Raw Materials Act** make sense, the EU needs to take an approach based on open strategic autonomy, which prioritises diversification of supply.

Broaden the scope of the **Net-Zero Industry Act** as part of an entire value chain approach since all industrial sectors need to be part of the net-zero transformation.

Informal alliances and strategic partnerships must be characterised by openness and remain accessible for developing countries who are crucial players in supply chains. The EU should seek mutually beneficial partnerships with developing economies rooted in the principle of fairness.

European business remains supportive of environmental and human rights protection objectives with an aim to enforce responsible supply chains. The focus on higher standards must go hand in hand with capacity building support and financial schemes that facilitate countries to achieve the **Sustainable Development Goals**.

The **Corporate Sustainability Due Diligence Directive** and the **Forced Labour Ban** aim to identify and mitigate adverse human rights and environmental impacts in global value chains. Requirements should be well-designed, proportional and clear. Overly-prescriptive rules of purely punitive nature could risk pushing European companies out of third countries at the expense of local communities and limiting access to raw materials essential for the EU's sustainability transition.



5

Lead a digital decade that is open for business

Enhance further opportunities by fostering digital trade and enabling trusted cross-border data flows

Digital trade matters to competitiveness and resilience

The continued integration of digital technologies and data innovation across the economy and society is strongly influencing international trade in scale, scope and speed. Digital trade influences the global economy and every company, regardless of its activity and size, by allowing access to virtually limitless export markets with relatively low investment. Further digitalisation plays a key role in enabling Europe's green transition and international trade is important to ensure that the most efficient digital solutions can spread globally, enabling a global green transition. In addition, digital solutions can also help decarbonise trade activity e.g. in logistics. Global digital trade is growing exponentially, with global exports of digitally delivered services increasing 8.1% on average per year from 2005-2022, outpacing goods (5.6%) and other services exports (4.2%). Europe accounts for over half of global exports in digitally delivered services which were valued at USD 3.82 trillion in 2022.

Trusted cross-border data flows matter to modern business and rights

The growth and scale of digital trade demonstrates how free trusted cross-border data flow is key for enterprise competitiveness and innovation. Trusted data flows provide adequate safeguards for personal data, intellectual property rights and trade secrets. In the absence of a multilateral framework on digital trade and proliferation of regulators, a growing regulatory divergence is resulting in fragmentation of the international digital market. Such fragmentation impacts competitiveness, particularly for SMEs. Free trusted cross-border data flows must be complemented by the prohibition of forced data localisation and the prohibition of mandatory disclosure or transfer of source code and algorithms. These requirements represent the backbone of any ambitious digital agreement or chapters in trade agreements. Adopting adequate and harmonised regulatory frameworks to improve interoperability and incentivise the mobilisation of private investment is needed to expand safe and accessible internet coverage for all.

Revitalise and modernise rules on digital trade at the WTO

The lack of conclusion of the negotiations on the WTO Joint Initiative on e-commerce and lack of permanent extension of the Moratorium on Customs Duties on Electronic Transmissions continues to pose threats to global digital trade. As highlighted by the 2023 OECD Trade Policy Paper, which focused on 'Understanding the Potential Scope, Definition and Impact of the WTO E-Commerce Moratorium', the cost associated with the lapse of the Moratorium extends beyond fiscal implications. The paper highlights that tariffs on electronic transmissions would hit low-income countries' trade the most, reduce domestic competitiveness globally, distort a predictable and duty-free environment associated with trade and impact smaller and women-owned firms. The EU needs to position itself as a key force in finalising negotiations and delivering agreements at the 2024 WTO Ministerial Conference in Abu Dhabi.

Recommendations to Irish and EU policy makers

Ensure a multilateral framework that safeguards free cross-border data flows, along with adequate protection of personal data, intellectual property rights and trade secrets.

Support Europe's innovation-driven economy by **concluding ambitious digital agreements or chapters in trade agreements** that prohibit forced data localisation. Include provisions on the non-discrimination of services or goods provided by electronic means, the prohibition of forced transfer of technology, trade facilitation, consumer protection and appropriate instruments to ensure technical interoperability and common standards.

The rules agreed in the digital trade chapter of the **EU-UK Trade and Cooperation Agreement** should represent a key reference in the negotiations of other trade agreements.

Reinforce bilateral trade agreements without relevant provisions on digital trade with an appropriate **digital trade agreement**.

Assess the impacts of any European legislation or standards in the digital area on trade and investments, as well as on the competitiveness of European businesses outside the EU.

Prioritise the conclusion of the negotiations on the **WTO Joint Initiative on e-commerce** and the extension of / making permanent the **Moratorium on Customs Duties on Electronic Transmissions** in the negotiation agenda of the European Commission.

Support an approach that encourages digital capacities across the EU while remaining open to further international co-operation and trade with like-minded partners so Europe can access and safeguard the economic benefits of further digital transformation. Deepen Europe's digital leadership without eroding trust in market openness, access, innovation and choice. Avoid inward-looking and protectionist measures that would harm European competitiveness.



Irish trade by the numbers

Table 1: Goods Exports

Irish trade in 2022 was significantly above 2019 levels reflecting a strong economic recovery following the Covid-19 pandemic. Ireland's high-tech manufacturing sector contributes substantially to our strong export performance. Ireland is the No.3 exporter of complex pharmaceutical goods, medicines and immunological products in the EU. We are the No.2 exporter of medical devices, contact lenses and orthopaedic products in the EU. Ireland's food and drink sector also plays an important role in our export performance, with Ireland the No.1 net exporter of dairy ingredients, specialised nutrition products, beef, lamb and spirits in the EU.

	2019		2022		Percent Growth
	€millions		€millions		
Total Goods Exports	152,534	100.0%	208,208	100.0%	36.5%
Medical & Pharmaceutical Products	49,521	32.5%	80,038	38.4%	61.6%
Organic Chemicals	30,044	19.7%	36,792	17.7%	22.5%
Professional, Scientific & Controlling Apparatus	6,801	4.5%	9,383	4.5%	38.0%
Food and Drink	13,223	8.7%	16,841	8.1%	27.4%
Other	52,944	34.7%	65,154	31.3%	23.1%

Table 2: Services Exports

Ireland's service sectors are playing an increasingly important role in Ireland's export performance. The strength of the digital and technology sector is reflected in substantial exports of computer services. Other important sectors include business services and international financial services. Ireland's exports of transport services reflect the strength of the aviation leasing industry in Ireland.

	2019		2022		Percent Growth
	€millions		€millions		
Total Services Exports	221,370	100.0%	339,622	100.0%	53.4%
Financial Services	16,867	7.6%	21,836	6.4%	29.5%
Computer Services	117,099	52.9%	195,719	57.6%	67.1%
Business Services	43,792	19.8%	63,786	18.8%	45.7%
Tourism and Travel	5,739	2.6%	6,686	2.0%	16.5%
Transport	8,041	3.6%	7,795	2.3%	-3.1%
Other	29,832	13.5%	43,800	12.9%	46.8%

Source: CSO Data

Table 3: Ireland's top trading partners (Based on goods)

The EU accounted for 38.7% of Irish exports and 30.3% of Irish imports of goods in 2022. Ireland's top EU trading partner is Germany followed by Belgium and the Netherlands, which both operate as EU distribution centres. Outside the EU, Ireland's top trading partner is the USA, which accounted for 30.3% of exports and 15.5% of imports in 2022. The UK remains a key trading partner, accounting for 10.6% of exports and 21.0% of imports. Ireland's trading relationship with Asia is growing with China, accounting for 6.6% of exports and 10.4% of imports of goods in 2022.

Exports	2019		2022	
	€millions		€millions	
Total	152,534	100.0%	208,208	100.0%
EU27	56,648	37.1%	80,639	38.7%
Germany	13,601	8.9%	25,223	12.1%
Belgium	15,505	10.2%	17,594	8.5%
Netherlands	8,622	5.7%	14,219	6.8%
France	5,435	3.6%	7,156	3.4%
Italy	3,900	2.6%	4,543	2.2%
Other EU	9,585	6.3%	11,903	5.7%
USA	46,960	30.8%	63,032	30.3%
UK	15,789	10.4%	22,109	10.6%
China	8,930	5.9%	13,789	6.6%
Japan	2,824	1.9%	4,100	2.0%
Switzerland	5,529	3.6%	3,275	1.6%
Other	15,855	10.4%	21,266	10.2%
Imports				
	2019		2022	
	€millions		€millions	
Total	90,862	100.0%	140,199	100.0%
EU27	33,299	36.6%	42,447	30.3%
Germany	7,484	8.2%	10,435	7.4%
Belgium	1,655	1.8%	2,366	1.7%
Netherlands	3,110	3.4%	4,756	3.4%
France	12,333	13.6%	12,183	8.7%
Italy	1,450	1.6%	2,348	1.7%
Other EU	7,266	8.0%	10,359	7.4%
USA	14,023	15.4%	21,721	15.5%
UK	20,387	22.4%	29,395	21.0%
China	5,236	5.8%	14,541	10.4%
Japan	1,172	1.3%	3,174	2.3%
Switzerland	2,158	2.4%	6,410	4.6%
Other	14,588	16.1%	22,512	16.1%

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