**Introduction**

As Chairman of the Contract Cleaning Joint Labour Committee (JLC), the Committee has requested that I forward the attached proposal which was formulated at a meeting of the JLC on the 30th of August 2023, and subsequently adopted by the JLC at its meeting of the 23rd of November 2023 to amend Employment Regulation Order, S.I. No 110 of 2022 **(**ERO), dated 7th March 2022, to the Labour Court for adoption, along with this report which confirms that the JLC has complied with Sections 42 A and 42 B of the 1946 Industrial Relations Act as amended by section 12 of the IR (Amendment) Act 2012.

This report confirms that, in considering the proposals, the JLC has had regard to the matters set out in subsection (6) of section 42A, and also sets out the circumstances surrounding the adoption of the ERO proposals as required in Section 42B.

The amendments to the Employment Regulation Order proposed is in relation to the provision of remuneration and conditions of employment for contract cleaning workers, as defined in part 1 of the Schedule of the attached Contract Cleaning Employment Regulation Order and is submitted to the Court in accordance with Industrial Relations Acts 1946 to 2012.

The JLC considered two submissions, which were received from two individual workers, following the public notice published on the 20th of September 2023, and this report outlines how the Committee engaged with the submissions received.

In addressing each of the matters that fall within the scope of section 42A (6) of the IR Act 1946, the Committee maintains that this proposal will promote harmonious relations between workers and employers and will avoid industrial unrest.

The legislation states that when formulating proposals to submit to the Court under subsection (1), a Joint Labour Committee shall have regard to the following matters:

1. the legitimate interests of employers and workers likely to be affected by the proposals, including—

# the legitimate financial and commercial interests of the employers in the sector in question,

The contract cleaning industry in the Republic of Ireland is predominantly characterised by a relatively small number of medium and large sized employers which account for over 80% of the total numbers employed in the industry. The remaining 20% of the market is highly fragmented and is characterised by very small scale and single person operations.

Data published by the CSO and set out in the table below shows the numbers employed in the Cleaning Activities sector[[1]](#footnote-2) up to 2021, though detailed data only goes up to 2020. Large enterprises are defined as 250 employees or more while medium enterprises are defined as between 50 and 249 employees (small enterprises have 10 to 49 employees while micro-enterprises have less than 10 employees).[[2]](#footnote-3)

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| **Employment in Cleaning Activities by Number employed in Enterprise: 2019 – 2021** | | | |
|  | **2019** | **2020** | **2021** |
| Under 10 | 1,651 | 1,616 | 1,696 |
| 10 - 19 | 1,081 |  |  |
| 20 - 49 | 2,344 | 2,172 | 2,431 |
| 50 - 249 | 3,936 | 3,404 | 3,437 |
| 250 and over | 21,257 |  |  |
| **Total Employed** | **30,269** | **27,960** | **28,321** |

In the Cleaning Activities sector, there were 28,321 employees in 2021. This is a small reduction over 2019 levels, but this could be due to the impact of Covid and lockdowns. 83 percent of all employees worked in medium-large enterprises in 2019. While there is no data for 2020 and 2021, it is highly unlikely that this concentration of employees would have changed significantly.

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| **Turnover in Cleaning activities: 2014 – 2021 [[3]](#footnote-4)** | | | | | | | | |
|  | **2014** | **2015** | **2016** | **2017** | **2018** | **2019** | **2020** | **2021** |
| Turnover *(€ million)* | 604 | 743 | 843 | 939 | 928 | 1,064 | 940 | 1,082 |
| Turnover Per Employed *(€ 000)* | 25.8 | 29.6 | 31.9 | 34.7 | 33.7 | 35.1 | 33.6 | 38.2 |

Between 2014 and 2021, turnover increased by a substantial 79 percent, with turnover per employee (productivity) rising by 48 percent. While 2020 unsurprisingly saw a decline in the sector, turnover bounced back the following year.

The contract cleaning industry includes contract services to both public and private clients. Public service clients operate across various sectors, such as healthcare, education, transport aviation and government services. In the private sector, Clients operate in manufacturing, retail, life science, pharmaceutical, and corporate and financial services.

The Irish Contract Cleaning Association is the principal representative body for the Contract Cleaning Industry and their members currently employ approximately 27,000 people in 30 member companies representing approximately 80% of all employees in the industry and as such they are very representative of the total number of employers operating in the market.

The Irish Contract Cleaning Association (ICCA) represents and lobbies on behalf of its member Companies.

Membership of the ICCA is open to companies involved in the provision of commercial cleaning services in Ireland. The main objectives of the Association are:

* to represent member companies involved in the provision of cleaning services on a commercial basis in Ireland; to seek status and prestige for the industry and public recognition of the industry’s vital role.
* to assist the industry in promoting professional training and recruitment in order to raise industry standards.
* to create a forum for the free exchange of information and experience, and networking opportunities among members through discussion, study, publications, and social activities.

It is in the commercial and financial interests of employers within the sector to agree to an ERO that effectively sets a collectively bargained wage for workers in the sector and allows employers to provide guidance and support in relation to cost increases for Clients in a timely fashion thus minimising the risk of reactionary cutbacks due to lack of budgeting.

Companies within the contract cleaning sector operate in a highly labour intensive, low margin marketplace, where labour costs account for a very high share of the total costs and where there is little or no differentiation in the services offered by competitors. Companies commonly set prices as a mark-up above the statutory sectoral minimum wage. An ERO sets down a level playing field in terms of labour costs, which provides for companies to compete on mark-up, other indirect charges, and service.

There is a long-standing custom of collective bargaining between employers and trade unions in the contract cleaning sector via the Contract Cleaning JLC. It has been in existence since the mid 1980’s and even when the constitutional basis for wage bargaining via the JLC system collapsed in 2011, employers and trade unions continued to collectively bargain.

When the ERO system collapsed in July 2011, the industry partners agreed a 6-month interim REA from February 2012 to August 2012. They were in the process of seeking a further REA for the industry when the Supreme Court judgement in May 2013 resulted in the striking

down of the REA structure. The majority of employers continued to pay €9.50 per hour post the collapse of the ERO and REA, in accordance with previous agreements. When the legal framework was put in place to allow for the re-establishment of the JLC structure, agreement was reached by the Committee to increase the rate to €9.75 per hour which took effect under the provisions of S.I. No. 418 of 2015 on October 1st, 2015. Further increases up to €10.05,

€10.40 and €10.80 per hour were agreed by the JLC and provided for in S.I. No. 548 of 2016

and to €11.20 under S.I. 608 of 2020, and more recently under S.I. No.110 of 22 in April 2022 up to €11.55, April 2022, 11.90 in April 2023, and €12.30 in April 2024

Due to the significant changes in the National Minimum Wage, which will be effective from the 1st January 2024, and consistent with the Committees desire to set prices above the statutory sectoral minimum wage, it has been proposed that the proposed rate would be increased to reflect this desire.

The Irish economy, having experienced significant disruption due to the Covid-19 pandemic, and significant increases in the cost of living as a result of the Ukrainian War, is now recovering though the pace of that recovery is still contingent on the success of the European and international economies.

In taking these difficulties into account, the contract cleaning employers have considered the financial and commercial impact on the contract cleaning sector and are of the view that the level of certainty a settled wage would bring, during these difficult times, will be of benefit to Clients and Employers when planning and forecasting expenses over what is continuing to be turbulent times whilst the country addresses the ongoing consequences of international economic uncertainty.

In addition to certainty of costs, the Employers equally recognise the need to ensure that those employees delivering this important service receive a pay increase. Employers considered the proposed one-year agreement appropriate to ensure the retention of staff and the sustainability of the contract cleaning industry.

# the desirability of agreeing and maintaining efficient and sustainable work practices appropriate to the sector in question,

It is submitted by both the employers and employee representatives that the rates of pay agreed by the JLC in this proposed ERO would act as an efficiency wage and, as such, could increase and not lower total employment levels in the industry in what has become a very competitive employee marketplace.A proven track record of reliability and the persistent quality of service is critical for employers to retain and win new contracts. By setting the ERO rate above the national minimum wage, employers incentivise staff loyalty and higher quality service delivery, thereby reducing supervisory costs (crucial to an industry that depends on workers operating in small, atomised units), improve staff retention, reduce staff turnover, training and recruitment costs.

Any differential between the national minimum wage and the ERO rate is offset over the medium term by savings to the payroll brought about by lower staff turnover which gives rise to reduced training costs, Garda vetting and uniform costs and lower recruitment costs.4

The role of the Contract Cleaner has developed significantly over the years. Contract cleaning companies have seen increased levels of responsibility, more detailed service provision and higher standards built into contract cleaning contracts with clients. Infection control and prevention continues to be a critically important aspect of the contract cleaners’ role in the context of covid 19 and its variants.

Examples of the increased role of Cleaners on client sites are:

* Compliance with regulatory & operational standards
* Heightened customer care & client expectations
* The provision of services in a variety of challenging working environments
* Increased consideration of environmental, quality, health and safety risks and standards.

This increased role brings with it an additional investment in training, which again creates a need for sustainable rates of pay in the industry to maintain a low level of employee turnover to ensure training costs are manageable for employers.

Cleaning has also become highly specialised in a number of industrial sectors such as healthcare, pharmaceutical and clean room environments, with a high level of on-the-job specialised training.

# the desirability of agreeing and maintaining fair and sustainable minimum rates of remuneration appropriate to the sector in question,

The proposed ERO will be a critical piece of infrastructure to maintain fair and sustainable rates of remuneration and a sustainable industry for all stakeholders i.e. clients who procure the service, contractors who provide the service and workers who deliver the service.

In the absence of the proposed ERO, contractors would be forced to compete on labour costs given that they account for a substantial share of the cost base. This would likely result in cuts in the hourly rate of pay and/or cuts to workers’ hours. Contract cleaning is already a relatively low paid, labour-intensive industry. Cuts to wages and hours would result in some industrial unrest, disruption of service (including critical services) and increasing non-compliance with TUPE.

4 Gregg Paul (2000). The use of wage floors as policy tools. OECD economic studies no. 31 2000/11.

The absence of legally enforceable fair and sustainable rates of remuneration, as outlined in the proposed ERO, would lead to more volatile service provision and a less sustainable industry in the short to medium term. It is clear the industry will not be able to develop and progress if the workforce becomes more transient.

A 11.76% increase in the hourly wage rate from €11.90 to €13.30 from the date of signing/effective date of the Order, represents a realistic increase for workers in the context of rising living costs over the last few years and the proposed increase in the Minimum Wage. The Consumer Price Index rose by 19.7 percent since the beginning of 2021 up to October 2023. 5

Further, the CSO has found that the rate of inflation is higher on low-income households. For example, inflation is 5 – 14 percent higher for households in the lower half of the distribution table.6 This is due to a higher proportion of expenditure on items that that have been particularly impacted by inflation; for example, energy. Therefore, workers covered by this agreement could be facing inflation rates that are higher than the national average.

It is recognised that already many contract cleaners who work, on average, 19 plus hours per week and who have dependents may qualify for the working family payment payable by the Department of Employment Affairs and Social Protection.

1. **the desirability of maintaining harmonious industrial relations in the sector in question,**

The Committee contend that renewal of the ERO will help maintain and deepen progressive and harmonious relations between workers, their union and employers and assist in the avoidance of disputes.

The majority of workers employed by ICCA member companies are covered by collective bargaining, as employers engage in forms of collective bargaining with SIPTU, the main Union operating in the industry on behalf of workers and UNITE.

There has not been any official industrial action in this industry for many years and we believe this is significantly and largely due to the fact that the industry has come under the JLC/ERO process since the mid 1980’s.

It is submitted that widespread industrial unrest was prevented following the JLC collapse in July 2011 due to the sustained observance of the previous ERO pay levels by the majority of employers’, as well as a joint commitment to the continued engagement by Employers and Unions in on-going dialogue to establish, initially an REA and, subsequently, the ERO which was initially given effect by S.I. No 418 of 2015 and has been updated since and now this proposed ERO which is being submitted to the Court for approval and adoption.

5 CSO Consumer Price Index: <https://data.cso.ie/table/CPM02>

6 CSO Estimated Inflation by Household characteristics: [Estimated Inflation by Household Characteristics - CSO - Central Statistics Office](https://www.cso.ie/en/releasesandpublications/frp/frp-eihc/estimatedinflationbyhouseholdcharacteristicsseptember2022/estimatedinflationbyhouseholdcharacteristics/)

The Committee contend that this JLC/ERO system is the fairest way to provide for increases in pay for contract cleaners on an industry wide basis and, consequently, avoiding any possibility for industrial unrest which could arise in the absence of this system. Therefore, the Committee is of the view that the increases provided for in this new ERO, when applied across the industry, will deliver a pay increase to contract cleaners and maintain a level playing field for employers in the industry, while at the same time maintain harmonious industrial relations and provide clients with an undisrupted service.

# the desirability of maintaining competitiveness in the sector in question

An ERO enhances the competitiveness of the contract cleaning sector principally through two mechanisms.

* 1. The propose new hourly rates in the proposed ERO will effectively act as an efficiency wage. As detailed above, the payment of a premium above the national minimum wage recognises the atomised nature and responsibility associated with the contract cleaners’ work and thereby promotes loyalty, low job turnover and reduced training, supervision, and associated costs.

For employers, this means lower long-term costs due to enhanced cost efficiency per worker, increased returns from any investment into workers such as training, greater

certainty in being able to financially plan, tender and retender for contracts. It also allows for Clients to plan/budget for the forthcoming increases. Also reduced transaction and search costs in that contract cleaning companies do not have to negotiate nor contend with various terms and conditions that might otherwise be agreed in contracts with client companies.

* 1. The large share of the cost base attributable to labour combined with the presence of an ERO ensures a level playing field for the payment of wages. This ensures no race to the bottom can develop amongst contract cleaning companies for the payment of wages, prevents predatory competitive behaviour, and ensures greater probabilities of survival and development for the companies already in and those entering the contract cleaning sector.

Given that wages account for between 80-85% of the cost base, contract cleaning companies effectively compete on the remaining 15%. On the downside for companies, labour’s share of the cost base along with the ERO means there is smaller scope for large margins, however on the upside, the large share of cost base attributable to labour along with the ERO ensures that contract cleaning companies are unlikely to run themselves into the ground through adverse competition.

The JLC contend that unless there is a mechanism, such as an ERO, it is difficult to ensure fair competition in this industry.

In terms of the impact on the cost base from the increase in the ERO proposed hourly rate; a 11.76% pay increase from the effective date of the ERO, i.e. from €11.90 to €13.30, this can be measured using wages as a percentage of operating costs: if wages make up 85 percent of operating costs, then the 11.76% pay increase would increase operating costs by 3.1%.

Due to the low margin nature of the contract cleaning industry, any adjustment in the cost base is likely to be passed onto the client, as has been the practice in the past. Hence the importance of companies being able to provide timely information on ERO increases to clients so that increases can be budgeted for.

As the barriers to entry to the market in general are relatively low, an ERO that is responsive to the legitimate financial and commercial interests of the industry, is one that facilitates a fair, balanced and more sustainable competitive market.

# the levels of employment and unemployment in the sector in question;

According to the CSO’s business demographic data, there were 28,300 employees in 2021 in cleaning enterprises.7

According to Eurostat data, the number of employees in cleaning activities fell from 24,600 in 2008 to 23,500 in 2014. However, since then employment has increased substantially, rising by 20 percent up to 2021, or nearly 5,000. This was at a time when the contract cleaning ERO increased by 10.8 percent between 2016 and 2020 (December). Clearly, the wage increase during that period was not a bar to increasing employment.

Raising the sectoral wage rate has decreased labour demand in the sector to date under the existing ERO. The committee are of the view that this proposed ERO will have no negative impact on labour demand in the sector. The impact of Covid reduced economic activity in the sector. However, it has quickly recovered.

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| --- | --- | --- | --- |
| **Selected Indicators: 2019 – 2021 8** | | | |
|  | **2019** | **2020** | **2021** |
| Turnover  *(€ million)* | 1,063.9 | 940.2 | 1,081.9 |
| Value-Added  *(€ million)* | 553.2 | 675 | 720 |
| Employees | 30,269 | 27,960 | 28,321 |

7 Source: See Footnote 2 above

8 Eurostat: <https://ec.europa.eu/eurostat/databrowser/view/sbs_na_1a_se_r2/default/table?lang=en>

Turnover fell in 2020 but recovered in 2021, exceeding 2019 levels. Value-added continued to rise despite Covid while employment started rising after a fall in 2020.

The JLC believe that it is important to implement the proposed increase in pay to retain and increase the workforce in the sector and to maintain the professional standards delivered by the contract within the context of a rapidly recovering sector.

The JLC are of the view that the absence of an ERO is more likely to lead to an increase in

displacement / redundancies as a result of some Employers’ refusal to apply TUPE.

It is also important to note that work carried out by contract cleaners, similar to waitering staff, bar service and portering staff have become entry level occupations. Entry level occupations tend to have three main characteristics:

(i) they do not require certified skills and

(ii) tend to attract migrants new to the Irish labour market and Irish nationals entering or re- entering the labour force after a period spent outside of it and (iii) most of the training is conducted on taking up employment and throughout employment.

The implementation of the proposed ERO will create no additional barriers to entry in the contract cleaning market. This proposed ERO sets minimum pay and conditions of employment for the contract cleaning industry. The committee considers the terms of this ERO will actually facilitate new entrants to compete in the market as it provides a level playing field for the largest component of the cost base.

The JLC believes that the industry is well placed to agree to a new national ERO for contract cleaning workers.

# the general level of wages in comparable sectors;

Contract cleaning is a labour intensive, low formal skill sector and the conditions for entry into the contract cleaning sector can be said to be comparable to the hotel, catering or retail sectors. However, since these JLCs have not been re-established, and no ERO currently exist for each of these sectors, they can no longer be referred to as comparators.

Instead, we cite the private security sector as being comparable. Both perform ancillary services to client companies. These are best described as facilities management services.

The hourly rate of pay in the Security industry was €11.65 and the Labour Court have approved the revised following hourly rates:

€12.90 per hour – From the 1st September 2023

While this is currently lower than that proposed for Cleaners, this is due to legal challenges to the ERO which have now been addressed and we believe the rate will be returning to a higher rate than the cleaning industry due to the need for licencing and skill requirements and the overall regulation of the industry.

The Committee also submits some examples of collectively bargained pay rates in the retail industry, and in the services industry which we contend would be an appropriate comparator, given that there are no entry level qualifications or skills required but similar to cleaning, training is provided upon taking up employment.

The average Retail scale goes from €13.53 ph. - €14.07 ph.

Aldi hourly rate: €14.80 ph.

Contract Cleaners regularly work alongside direct employees carrying out the same or similar cleaning role, and consequently would be comparable to workers employed by the HSE for example. Cleaners employed by the HSE start on hourly rate of € 15.05.

# where enterprises in the sector in question are in competition with enterprises in another Member State, the general level of wages in the enterprises in that other Member State taking into account the cost of living in the Member State concerned;

Contract cleaning is a non-traded, domestically provided service. At present, firms with headquarters located within and outside the Republic of Ireland compete for contract cleaning service contracts in the country. Firms located in the UK and in Northern Ireland make up the bulk of the external competition. However, the very nature of the service means that service provision has to take place within the country in question and as such companies are bound by the wage and employment law that pertains to the sector in the country and not that of any other Member State of the European Union.

The Committee contend that Contract Cleaning employers are not in direct competition with employers in other member states paying alternative rates of pay. Contract Cleaning services supplied in Ireland by indigenous Irish owned companies or international multinationals are bound by regulation, wage and employment law that pertains to the Sector in Ireland, and as contained in this proposed ERO, rather than the laws of any other EU member State.

# the national minimum hourly rate of pay declared by order for the time being in force under section 11 of the National Minimum Wage Act 2000, and the appropriateness or otherwise of fixing a statutory minimum hourly rate of pay above that rate;

The national minimum wage (NMW) is currently €11.30 per hour rising to 12.70 on the 1st January 2024, while the Living Wage, as established by the Living Wage Technical Group, is €14.890 for 2023/4.9 As set out under sections (a) (ii) and (a)(v) above, the contract cleaning JLC agrees that a premium over and above the national statutory wage floor is necessary within the contract cleaning sector to ensure that companies operating within the contract cleaning sector remains viable. The wage premium can act as an efficiency wage for companies. By increasing staff loyalty, the company reduces staff turnover, it lowers supervisory, training and contract search costs and effectively ensures greater productivity and cost efficiency per worker.

9 Living Wage Technical Group: [www.livingwage.ie](http://www.livingwage.ie/)

# the terms of any relevant national agreement relating to pay and conditions

There is no national agreement other than what is being proposed by this Joint Labour Committee for the Contract Cleaning Industry. In the absence of an ERO for this Sector there is no other effective mechanism for establishing a fair rate of pay and conditions of employment for workers in this industry.

We have already referenced in Section (b) details of rates of pay in comparable employments and employments that engage the services of contract cleaners.

# Section 42B - The circumstances surrounding the adoption of the proposed ERO

The JLC formulated proposals for an employment regulation order at its meeting on the 30th August 2023 and in accordance with section 42B of the Industrial Relations 1946, a notice was published on the 20th of September 2023 with a closing date for submissions on the 10th of October 2023 in the Irish Times, the Irish Examiner, the Irish Independent and Seachtain. The notice stated that copies of the proposal were available on the Labour Court’s website and invited any person wishing to make a submission to do so in the form of a submission on or before the 10th of October 2023. A copy of both notices is attached.

Two submissions were received by the Secretary of the Labour Court from two workers, a copy of which was issued to members of the JLC in advance of our meeting scheduled for the 23rd ofNovember 2023. A copy of these submissions is attached.

At the meeting held on the 23rd of November 2023 the submissions were read into the record and the Chairman asked the Committee if there were any amendments it considered appropriate.

The JLC considered the contents of the submission from two workers seeking a rate of pay for working at night however the purpose of the amendment of this Order is to fixes the statutory minimum rate of remuneration for all workers in the Contract Cleaning Industry.

Mr. John Barry representing the Employer’s side responded that this ERO amendment is to address the change in the minimum wage and that is the primary focus of this particular ERO.

Ms. Rachel Keane representing the Union’s side echoed the Employer’s statement, noting that the JLC reconvened to increase the minimum rate of pay for contract cleaners and any further increases or rate changes would be addressed in the future.

The Union side noted that the industry is experiencing difficulty recruiting staff at the moment so there was a need to make the industry competitive in order to attract and retain staff and ensure flexibility amongst staff so as to maintain employment thus a need to maintain a consistent rate of pay.

The Employer side confirmed that they were supportive of implementing the increase rather than delaying it and believed that it will not have an adverse effect on employment within the industry at this time and will assist recruitment into the industry and ensure that employment levels can be maintained and even increased.

The Committee by having considered the representations made by the two workers and being satisfied they had full regard to all matters set out in 42A Section (6), adopted the ERO proposals at its meeting on the 23rd November 2023.

At that same meeting the Committee discussed the Chairman’s report, a copy of which was issued to each member of the Committee. The Committee concluded that the report along with the supporting documents demonstrates that the JLC has had regard to the matters set out section 42A (6).

It was agreed that the ERO proposals along with the Chairman’s report would be submitted to the Labour Court and this was done on the 2nd of February 2024

**Conclusion**

The JLC submit that this report has confirmed that in considering the ERO proposals, the JLC has had regard to the matters set out in subsection (6) of section 42A, and has also set out the circumstances surrounding the adoption of the ERO proposals as required in Section 42B.

The Committee therefore respectfully request the Labour Court to adopt the proposals to amend Employment Regulation Order, **S.I. No. 110 of 2022**.

1. This sector includes interior and exterior cleaning of buildings, specialised cleaning for buildings, cleaning of industrial machinery, disinfecting and extermination activities for buildings and industrial machinery, etc. [https://inspire.ec.europa.eu/codelist/EconomicActivityNACEValue/N.81.2](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Finspire.ec.europa.eu%2Fcodelist%2FEconomicActivityNACEValue%2FN.81.2&data=05%7C02%7Crkeane%40siptu.ie%7C609daa59a00947fbc36808dc008295e9%7Cb47628df374d4176b661a9858753cbac%7C0%7C0%7C638385808062902418%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=eMiQKLJWqdA7pOgSLMnBkAJCW2muFmHRx3mkdxJ%2FFmM%3D&reserved=0) [↑](#footnote-ref-2)
2. 2 Eurostat Annual Detailed Enterprise Statistics for Services: [https://data.cso.ie/table/BRA31](https://eur01.safelinks.protection.outlook.com/?url=https%3A%2F%2Fdata.cso.ie%2Ftable%2FBRA31&data=05%7C02%7Crkeane%40siptu.ie%7C609daa59a00947fbc36808dc008295e9%7Cb47628df374d4176b661a9858753cbac%7C0%7C0%7C638385808062902418%7CUnknown%7CTWFpbGZsb3d8eyJWIjoiMC4wLjAwMDAiLCJQIjoiV2luMzIiLCJBTiI6Ik1haWwiLCJXVCI6Mn0%3D%7C3000%7C%7C%7C&sdata=GCpACfMSfZ0MhazSC%2FBtgPHighqZrQeYpWXgx9NTceQ%3D&reserved=0) [↑](#footnote-ref-3)
3. <https://ec.europa.eu/eurostat/databrowser/view/sbs_na_1a_se_r2/default/table?lang=en> [↑](#footnote-ref-4)