

ISME responds to the National Risk Assessment consultation issued on 11th September as follows.

Geopolitical Risks

While there appears to be no imminent threat of a return to violence in Northern Ireland, recent events in Drumcree demonstrate that there is not a peacefully settled polity there.

Foreign Information Manipulation and Interference (FIMI)¹ is highly evident on social media and relevant enforcement activity against is having mixed results.

In 2025 two former MEPs were convicted of misuse of funds charges. A former MEP, from the British *Reform Party*, pleaded guilty to eight charges of accepting payments for the delivery of pro-Russian speeches in the European Parliament and to encourage others to do likewise,²

In the same year, in an entirely separate case, the leader of the far-right *Rassemblement National* (formerly National Front), was convicted for the embezzlement and misuse of EU funds.³ Meanwhile, a further entirely separate graft investigation has been underway since 2022 into a series of circumstances in which bags containing hundreds of thousands of Euro were discovered in the homes and/or with the family members of EU parliamentarians and policy chiefs.⁴

For these reasons, there are grounds for concern that greater preventative measures must be put in place to ensure that there is complete transparency with regards to funds given to elected and public policy officials both here in Ireland and in EU bodies.

Despite having no current ability to detect or interdict malign actors in our airspace or maritime domain, Ireland insists it remains militarily neutral, while calling on NATO members to provide naval and air cover for operations during the EU Presidency. The Attorney General has called into question⁵ the constitutionality of a foreign military using force within Irish territory.

A country lacking any air or naval strike capacity, and having only a token land defence capacity, is incapable of enforcing its responsibilities or vindicating its rights under the Hague Convention (V)⁶ for neutral countries.

¹ https://www.eeas.europa.eu/sites/default/files/2026/documents/EEAS%204th%20Threat%20Report_web.pdf

² <https://www.bbc.com/news/articles/c1e5gpe2629o>

³ https://www.lemonde.fr/en-decodeurs/article/2026/01/13/understanding-marine-le-pen-s-crucial-appeals-trial_6749363_8.html?srsltid=AU7gw4UVkO43F2S3pX4SH4EeOPBe3e8fK5SHPPqf-i9Aao_ywEI6a7UY#

⁴ <https://www.euronews.com/2025/12/12/three-years-on-former-mep-kaili-still-awaits-trial-in-case-slammed-as-belgian-gate>

⁵ <https://www.thejournal.ie/meeting-attorney-general-eu-presidency-security-rules-of-engagement-7079658-Jun2026/>

⁶ <https://ihl-databases.icrc.org/en/ihl-treaties/hague-convy-v-1907>

Ireland's position on defence is increasingly hard to articulate or justify in other member states. While we maintain a position of military neutrality with no capacity to defend it, citizens, employers and businesses with whom we interact with in Europe see actual hybrid threats to their states, economic and political systems, and are bearing an increased defence expenditure as a result. Several are reintroducing mandatory and voluntary military service.⁷ Neutral Austria is extending its military service⁸ requirement. Neutral Switzerland has imposed tighter restrictions on opting for civilian service instead of compulsory military duty,⁹ a restriction passed by referendum.

Economic Risks

Reliance on multinational corporations, sectoral concentration, and Ireland's enterprise mix have been cited on every NRA since the inception of the process in 2014. Despite this, successive national budgets have done nothing to address Ireland's enterprise mix, or to reduce our dependence on FDI. This is despite abundant and consistent advice from within Government bodies of the necessity of doing so:

1. The Central Bank has focussed on the need to improve domestic business dynamism.¹⁰
2. The NCPC has highlighted¹¹ the impact of "geopolitical fragmentation, trade tensions, technological disruption and energy insecurity, alongside persistent domestic pressures such as infrastructure deficits and the high cost of doing business" ahead of Budget 2027.
3. IFAC¹² reports that Exchequer revenues are becoming more concentrated, and that concentration is not in indigenous enterprise.
4. The ESRI's most recent Quarterly Bulletin¹³ notes "compounding concerns about tax base fragility."

Despite these warnings from trustworthy sources, the Tax Strategy Group (TSG) papers¹⁴ published in June propose no measures to reduce the Exchequer's dangerous degree of exposure to tax concentration among foreign multinationals domiciled here. This exposure is not just in corporation tax; as the ESRI notes, disproportionate amounts of income tax and VAT originate from FDI firms. The TSG proposes only that we limit current

⁷ <https://www.euronews.com/2026/04/27/defence-which-european-countries-have-mandatory-and-voluntary-military-service>

⁸ <https://www.aa.com.tr/en/europe/austrian-government-agrees-to-extend-mandatory-military-service/4064500>

⁹ <https://lenews.ch/2026/06/14/swiss-vote-to-restrict-civilian-service-alternative-for-young-men/>

¹⁰ <https://www.centralbank.ie/news/article/speech-decade-of-higher-investment-speech-by-deputy-governor-vasileios-madourois-12-february-2026>

¹¹ <https://competitiveness.ie/latest-news/budget-2027-securing-ireland-s-competitive-position/>

¹² <https://www.fiscalcouncil.ie/wp-content/uploads/2026/06/Fiscal-Assessment-Report-June-2026-pdf.pdf>

¹³ <https://www.esri.ie/system/files/publications/QEC2026AUT.pdf>

¹⁴ <https://www.gov.ie/en/department-of-finance/collections/budget-2027-tax-strategy-group-papers/>

expenditure and put more of the tax yield into a rainy-day fund. This will mitigate but not repair the problem.

The windfall gains from corporation tax should be prioritised for capital and infrastructure expenditure, but instead have flowed disproportionately into current spending,¹⁵ according to IFAC. This is risky given the long-term opacity of FDI corporation tax yields.

Eurostat figures show that Ireland has the lowest rate of youth entrepreneurship¹⁶ in the EU, which will severely limit our ability to create indigenous wealth within a generation.

The “extend and pretend” policy of ignoring the unfunded deficit on our social protection pensions liability of €471bn,¹⁷ and public service pension liability of €176bn¹⁸ is unsustainable, and must be addressed via higher personal PRSI contributions. ISME has previously proposed a 2% PRSI rate on weekly earnings up to €440 per week, and a 6% PRSI rate on marginal earnings above €440 per week.

Societal Risks

Defying the normal economic logic of supply and demand, as rental prices¹⁹ in Ireland hit all-time highs, small landlords exit the market and supply decreases. This is clearly due to a trajectory of legislation, regulation and taxation that has rendered the rental market unviable for anyone other than institutional landlords. Employers are filling the gap, with more businesses, especially in the services sector, expected to provide affordable (or free) accommodation for their staff. This is not productive or economic activity for these employers, and some of it may not be compliant with Revenue rules. Tax incentives will mitigate a supply gap where current construction constraints cannot.

The Covid 19 pandemic showed that Ireland had insufficient cold-chain resource to manage a large-scale vaccination requirement without significant private sector assistance.

Environmental Risks

Climate change is already impact crop yields in Europe and elsewhere. Ireland's domestic food supply chain effectively dependent on the retail grocery system.

¹⁵ <https://www.fiscalcouncil.ie/wp-content/uploads/2024/06/Fiscal-Assessment-Report-June-2024-Irish-Fiscal-Advisory-Council.pdf>

¹⁶ <https://ec.europa.eu/eurostat/web/products-eurostat-news/w/edn-20260421-1>

¹⁷ <https://www.gov.ie/en/department-of-social-protection/publications/accrued-to-date-liability-social-security-pension-schemes/>

¹⁸ <https://www.gov.ie/en/department-of-public-expenditure-infrastructure-public-service-reform-and-digitalisation/press-releases/minister-donohoe-publishes-actuarial-review-of-public-service-pension-liabilities-2/>

¹⁹ <https://www.daft.ie/report/rental/2026-q2-rentalprice-daftreport.pdf>

Germany's strategic food reserves²⁰ are a contingency measure in the event of a military event, a natural disaster, or a sudden fall in food production due to extreme weather. Ireland has no such strategic food-supply resilience.

The reduction in the Defence Forces Corps of Engineers²¹ strength to two field companies does not permit an adequate response to any flooding event requiring emergency bridging, power generation, water purification, wastewater treatment, or refrigeration.

Mackerel stocks in the North Atlantic are collapsing²² due to over-exploitation, a process worsened by Ireland's inability to patrol its Atlantic economic area due to lack of naval resource.

Technological Risks

With 88% of Ireland's gas needs being met by a pipeline from Scotland, and the 12% of supply originating from the Corrib field diminishing rapidly, it is unacceptable that Ireland has no gas storage reserves. Gas is an essential component of our thermal electricity generation and our domestic heating requirement. NORA should be additionally tasked with the maintenance of a strategic gas reserve, with at least 180 days of supply. Given the seriousness of the ongoing conflict in the Straits of Hormuz, this situation requires immediate rectification. The state should procure floating storage to be located at Whiddy Island or Whitegate as a matter of urgency.

While Ireland has abundant potential for generation of electricity from offshore wind, our only offshore wind facility ceased production in 2024.²³ Our planning system is so slow that the earliest we expect the next operational offshore wind development is 2030.²⁴

Given the length of time it takes to bring a wind energy project through the planning process, it is illogical that the planning permission attached to such projects should elapse after a fixed period.²⁵ This increases the cost of green energy for no socially beneficial reason other than fee generation.

In the circumstances, it makes no sense for Ireland to legally forsake the generation of baseload non-renewable energy from nuclear. The Electricity Regulation Act 1999 Section 18(6)²⁶ explicitly prevents the Commission for Regulation of Utilities (CRU) from authorising the use of nuclear fission for electricity generation. It should be repealed as a matter of public policy.

²⁰ <https://united24media.com/world/germany-bolsters-strategic-food-reserves-for-emergency-preparedness-18411>

²¹ <https://www.military.ie/en/who-we-are/army/army-corps/engineer-corps/>

²² <https://www.theguardian.com/environment/2025/apr/09/mackerel-stocks-near-breaking-point-because-of-overfishing-say-experts>

²³ <https://www.rte.ie/news/business/2026/0910/1591020-plans-lodged-to-dismantle-constructed-off-shore-wind-farm/>

²⁴ <https://www.blackridgeresearch.com/blog/latest-list-top-upcoming-offshore-windmill-farm-power-plant-projects-in-ireland?>

²⁵ <https://www.irishtimes.com/environment/2026/09/22/energy-firms-look-planning-changes-to-allow-offshore-wind-farms-to-run-indefinitely/>

²⁶ <https://www.irishstatutebook.ie/eli/1999/act/23/section/18/enacted/en/html>

The targeting of a member of the International Criminal Court²⁷ and their exclusion from international credit and debit card systems means the sovereign digital euro project must be executed as quickly as possible. The need for technological sovereignty extends to all digital, IT and data storage platforms, and EU member states cannot permit interference in internal affairs due to external political concerns or motivations.

Summary

The NRA process is pointless and redundant unless it is accompanied by a gap closure plan to address material threats. ISME believe that a gap closure plan similar to that used in the Action Plan for Jobs²⁸ process should be employed in order to do so, allocating departmental responsibilities and timelines.

²⁷ <https://www.rte.ie/news/2026/0329/1565784-icc-judge-sanctions/>

²⁸ <https://www.gov.ie/en/topics/action-plan-for-jobs/>