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We'll get by with a little help from our (EU) friends…Ireland, the Adequate Minimum Wage Directive, and the Action Plan for Collective Bargaining

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Abstract

Just over one year ago, in this journal, I wrote of how the Adequate Minimum Wage Directive, pre-transposition, was already having an impact on Irish law and policy regarding collective bargaining. There have been considerable developments over the past 12 months or so; the challenge to the Directive before the CJEU has been heard, and the matter settled, and Ireland is one of the first Member States to publish its Collective Bargaining Action Plan, as required by the Directive. In this short update, I will give some initial reflections on the Plan, and some thoughts on the future after the CJEU ruling.

Keywords: Adequate Minimum Wage Directive; Collective Bargaining; Action Plan, Ireland.

1. Introduction.

The genesis of this paper was an invitation to provide an update at a conference on developments in Ireland regarding Directive (EU) 2022/2041 of the European Parliament and of the Council of 19 October 2022 on adequate minimum wages in the European Union (the Adequate Minimum Wage Directive, AMWD). The conference, "Regulating Minimum Wages: Between the EU and the Member States" was scheduled to be hosted by the Law Faculty at the University of Luxembourg on November 10-11, 2025. As the date drew closer, it became apparent that the Court of Justice of the EU (CJEU) would deliver its ruling on Denmark's challenge to the validity of the Directive on the morning of November 11. Cue a gathering of extremely distinguished labour law academics (and this author) watching a live-stream of the judgment (as if it were a World Cup penalty shoot-out…) before the Conference sessions began. As is now well-known of course, and addressed comprehensively

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by Emanuele Menagatti in this volume, the Court upheld most elements of the Directive, particularly those relating to Article 4 (Promotion of collective bargaining on wage-setting), which is the principal focus of this update. The schedule for the Conference meant that the first paper to be delivered after the judgment was given was an update on Ireland. Readers who have ever attended a wedding, where there is a major international football match taking place at the same time,[1] will be familiar with the position of a Best Man, who is giving his speech fully in the knowledge that most of those present are scrolling on phones for match updates or scores. Giving a paper, to an audience of labour law devotees, moments after the CJEU decision in *Kingdom of Denmark v European Parliament and Council of the European Union*[2] very much approximated that experience!

However, the fact that the judgment was given moments before the update on Ireland's position in relation to Directive is an important part of the story. As I will emphasise in the conclusion, and as I argued in the piece in this journal last year,[3] the impact of the Directive can already be seen (at least in some Member States), and in the case of Ireland, the publication of the Collective Bargaining Action Plan (as required by Article 4 (2) of the Directive) days before the CJEU judgment was quite deliberate, and not (like the Conference date!) in any sense a simple twist of fate. This update proceeds as follows. The next section will, briefly, recap the Irish position up until the CJEU judgment. It will then assess some key elements of the Collective Bargaining Action Plan, before offering some thoughts on the future.

2. There's a slow train coming…

As is well-known, the Irish "Anglo-Saxon" model of industrial relations (IR) is conflictual, focused on the common law concept of freedom of contract, and provides notably weak legal protection for collective bargaining, and for collective worker representation in general.[4] The Irish Constitution, in Article 40.6.1, protects the right of freedom of association but trade unions in Ireland enjoy no rights to be recognised for bargaining purposes by an employer. Thus, while employees are free to join a trade union, they cannot insist that their employer negotiate with any union regarding their pay and conditions. Collective bargaining in Ireland, therefore, is seen as normative and collective agreements are usually not legally enforceable as they do not generally intend to create legal relations. In Ewing's terms, the Irish trade union movement leans heavily towards the "representational" function of trade unions, which sees collective bargaining as a private market activity conducted by unions, usually at the level of the company/ enterprise, as agents of a tightly circumscribed bargaining

[1] For those who have ever attended a wedding in Ireland, the more likely sporting clash will be with a major Gaelic Athletic Association (GAA) match. The GAA is Ireland's largest sporting organisation, an amateur association, which promotes, and organises annual competitions in Gaelic games, such as (Gaelic) Football, and the world's greatest sport, Hurling.
[2] Case C-19/23 (ECLI:EU:C:2025:865).
[3] Doherty M., *Make me good…just not yet? The (potential) impact of the Adequate Minimum Wage Directive*, in *Italian Labour Law E-Journal,* 17, 1, 2024.
[4] Doherty M., *ibidem.*

unit.[5] The Courts, and judiciary, were traditionally felt to be somewhat hostile to collective labour rights. As stated by the Chief Justice in *Zalewski v WRC & Ors*:[6]

The history of the interaction of the common law and the field of industrial relations is particularly strained. The individual, contractual, focus of what was at one time called the Law of Master and Servant was not easily reconciled with the collectivist approach of the developing trade union movement.

The oft-cited example of this "strained" history is the Irish Supreme Court judgment in *McGowan v The Labour Court*.[7] Here, the Court declared Part III of the *Industrial Relations Act 1946* (which established a system of sectoral standard setting, whereby "Registered Employment Agreements" reached by the sectoral social partners were extended *erga omnes)* to be unconstitutional (these agreements were significant in the construction sector). The tone of the judgment and the language used by the Supreme Court are noteworthy; the Court states (at para 8) that the provisions of Part III (and its *erga omnes* effect) appear "somewhat anomalous" today and give rise to the "prospect of burdensome restraints on competition for prospective employers and intrusive paternalism for prospective employees".

It is in this context of weak legal protections for, and perceived (or actual…) judicial hostility to, collective bargaining rights that the passing of the AMWD was greeted with much enthusiasm by the Irish Congress of Trade Unions (ICTU), and the union movement in general, as presenting a possible "European solution to an Irish problem".[8] It is also noteworthy that not long after the European Commission published its proposal for the AMWD,[9] and not long after the Directive entered into force (November 2022), two significant decisions were handed down by the Irish Supreme Court, which signalled a rather different direction of travel for the Court in terms of the legal protection of collective rights. The first, in 2021, involved a legal challenge to the system of setting sectoral terms and conditions of employment (involving the sectoral social partners) set up in 2015 to respond to the declaration of unconstitutionality in the *McGowan* case (discussed above). In a surprise to many observers of the Irish Superior Courts' jurisprudence in this area, the Supreme Court not only upheld the constitutionality of the system, but also seemed to indicate a willingness to move away, in collective labour law cases, from the traditional common law focus on individual freedom of contract towards a greater recognition of the collective labour law principles inherent in the European Social Model. MacMenamin J. focused in detail on the recent evolution of *EU Law* in a number of spheres. The judge accepted that a key objective of *erga omnes* sectoral agreements is to prevent "social dumping", and made reference to: the enactment of the amended Posted Workers Directive,[10] and the "social market principles" expressed therein; the Directive's *travaux préparatoires*, which expressed recognition of the

[5] Ewing K. D., *The Function of Trade Unions*, in *Industrial Law Journal*, 34, 1, 2005, 1-14.
[6] [2021] IESC 29 (at para 40).
[7] [2013] IESC 21.
[8] Thomas D., *An Opportunity to Review and Reframe Collective Bargaining and the Industrial Relations Regime*, NESC, Dublin, 2022, 42.
[9] *See* https://ec.europa.eu/commission/presscorner/detail/en/ip_20_1968 (accessed Dec 1, 2025).
[10] Directive (EU) 2018/957 of the European Parliament and of the Council of 28 June 2018 amending Directive 96/71/EC concerning the posting of workers in the framework of the provision of services (OJ/ L173, 16).

need for facilitating dialogue between social partners; and the rights to information and consultation (Article 27) and collective bargaining (Article 28) under the EU Charter of Fundamental Rights.

The second decision (which focused on the granting of injunctions to restrain strike action in Irish Law) was delivered in 2024.[11] Here, the Supreme Court acknowledged that trade unions and their members may have traditionally adopted a view that the "dice were loaded against them in the law courts" (per O' Donnell CJ, para 82). Justice Hogan (para 7) stated that the Constitutional right to form trade unions implied at least "some- perhaps as yet undefined- zone of freedom for those unions to organise and campaign".

We can therefore see, at around the same time, the EU legislator and the Irish Supreme Court moving away from the view (dominant during the years of austerity) that strong institutions of collective wage regulation hinder the functioning of free markets, limit employers' flexibility and therefore have a largely negative effect on growth and employment,[12] to an emphasis on the protection and promotion of collective rights as an expression of "Social Europe". Correlation does not, of course, equal causation. The timing of these Irish judgments might well be simply an example of serendipity. However, the steps taken by the Irish government and social partners in advance of November 11 2025 were most certainly *directly caused* by the Directive, both pre-, and post-, transposition.

3. Crossing the Rubicon?

First, shortly after the proposed AMWD was published, the Irish government established a tripartite High-level Working Group (HLG) to review collective bargaining and the industrial relations landscape in Ireland.[13] The Group was composed of senior employer and trade union representatives, civil servants and academics, and published its final report in October 2022.[14]

The Report makes a number of recommendations for reform of collective bargaining structures in Ireland. It recommended reform of the Joint Labour Committees (JLCs) system, which provides for the fixing of minimum rates of pay and the regulation of employment in certain sectors where there is little or no collective bargaining and where significant numbers of vulnerable workers were employed (e.g. retail, catering, and hotels).[15] JLCs propose "Employment Regulation Orders" (EROs), which, when confirmed by the Labour Court, set legally binding minimum wages and conditions of employment for workers in the sectors covered.[16] Currently, JLCs in many sectors in which they are established (notably, retail,

[11] *H.A. O'Neil Limited v. Unite the Union* [2024] IESC 8.
[12] Schulten T., Müller T., *A Paradigm Shift towards Social Europe? The Proposed Directive on Adequate Minimum Wages in the European Union*, in *Italian Labour Law E-Journal,* 14, 1, 2021.
[13] *See* Doherty M., nt (3).
[14] HLG Report, 2022, available at https://enterprise.gov.ie/en/publications/leef-high-level-group-on-collective-bargaining.html (accessed December 1 2025).
[15] Part IV of the *Industrial Relations Act 1946* (as amended).
[16] Doherty M., *Battered and Fried? Regulation of Working Conditions and Wage-Setting after the John Grace Decision*, in *Dublin University Law Journal*, 35, 2013, 97-120.

catering, and hotels) do not operate, as employer representatives do not attend the Committees, and so sectoral orders cannot be formulated. The HLG Report proposed a mechanism whereby, in the event employer representatives do not attend at JLCs, orders may be formulated, and enforced, in any case with the approval of the Labour Court. The HLG Report also proposed a mechanism of "Good Faith Engagement" at enterprise level, whereby employers that do not negotiate with, or recognise, trade unions (who count employees of the enterprise amongst their members) would be legally mandated to at least engage with a trade union, which makes representations on its members' behalf.[17]

Throughout the Report it is clear that the EU context was of paramount importance to the Group's work, in particular in preparing for the (then) draft AMWD, and that the recommendations would form part of Ireland's approach to providing a "framework of enabling conditions for collective bargaining and the establishment of an action plan to promote collective bargaining" (p. 18). The Report acknowledged that there were some aspects of the proposed AMWD, which the Group did not address (for example, measures on the awarding of public procurement and concession contracts, and easing the access of trade union representatives to workers) and recommended that any remaining issues of transposition should be addressed in a similar tripartite manner to those examined in the HLG Report (p. 8).

The publication of the Report was warmly welcomed by the Government.[18] However, by mid-2024, no action had yet been taken on its recommendations, there was some discord between the peak social partners on the transposition process,[19] and there was a turbulent and uncertain economic environment sparked by the protectionist trade policies of the new administration in the United States. The Directive was transposed (just about on time) in November 2024 by means of the *European Union (Adequate Minimum Wages) Regulations 2024*.[20] The Regulations made minimal adjustments to the *National Minimum Wage Act 2000* (in line with Article 5 of the AMWD) but made no reference at all the collective bargaining, and nothing from the HLG Report featured. As a result, the transposition was strongly criticised as being minimalist in nature; a criticism echoed in many Member State capitals.[21]

[17] HLG Report, nt. (14), 10-12, 20-22.

[18] See: https://enterprise.gov.ie/en/news-and-events/department-news/2022/october/publication-of-the-final-report-of-the-leef-high-level-working-group-on-collective-bargaining.html (accessed December 1 15 2025).

[19] The ICTU view was that a robust transposition of Directive could "transform the union landscape", while Ibec (Irish Business and Employers' Confederation) was of the view that any adjustment of the references in Irish Law to collective bargaining was not necessary; and little if any transposition was required, Doherty n 3.

[20] S.I. No. 633/2024.

[21] Müller T., *Here comes the sun: the formal transposition and political impact of the European Directive on Adequate Minimum Wages in the EU,* ETUI Report, Brussels, 2025.

4. When the deal goes down…[22]

This is where the second direct impact of the Directive can be seen. Just as the negotiations for, and proposal of, the AMWD had been instrumental in setting up the HLG, the announcement of November 11 2025 as the date on which the CJEU would give judgment in the action for its annulment provided a new "deadline" for the Irish labour relations actors; to conclude a Collective Bargaining Action Plan.[23] *Ireland's Action Plan to Promote Collective Bargaining 2026–2030* was published on November 5 2025.[24] It is structured around four core themes; Empowering and Encouraging; Promoting; Protecting; and Supporting the IR Institutions. It includes an opening section explaining the benefits of collective bargaining, and closing sections on implementation, monitoring, and the role of the social partners. There are 22 action points listed in the Plan, each naming the responsible/ lead party and the key stakeholders, as well as outlining the timeline for completion, the resources required to implement the action, and success indicators.

The first theme, *Empowering and Encouraging*, is referenced as being part of broader commitments under the *EU Pact for European Social Dialogue* (which includes the *Quality Jobs Act*, announced in September 2025). This seeks to addresses the ongoing decline in trade union membership, "including targeted actions to reverse this trend through robust capacity building initiatives" (p. 11), for example, funding for training programmes aimed at trade unions, and human resource professionals. It also includes an action point on public procurement, addressed below.

The second theme, *Promoting*, emphasises policy measures that advance collective bargaining but "without resorting to extensive legislative intervention" (p. 17). The emphasis in this section, and indeed throughout the plan, is very much on the maintenance of the IR model outlined at the start of section 2, above (actions "must remain fully aligned with Ireland's longstanding voluntarist tradition"; p. 17). Key actions include developing and disseminating a (legally non-binding) Code of Practice on Collective Bargaining; and exploring the introduction of tax relief for union subscriptions, and other tax options to promote collective bargaining. There are also actions relating to trade union access to workplaces, and JLCS (discussed below).

The third theme, *Protecting*, includes: assessing the feasibility of introducing a mandatory mediation process between the notification, and the taking, of industrial action; reviewing the protections for trade union activities under the Unfair Dismissals legislation; and examining legal protections, or the scope of legal protections, for trade union representatives.

The fourth theme, *Supporting the IR Institutions*, includes a commitment to invest in the digitalisation and modernisation of IR institutions, in particular, the key State labour dispute resolution bodies, the Workplace Relations Commission (WRC) and the Labour Court. A

[22] "*In this earthly domain, full of disappointment and pain,*
You'll never see me frown,
…And I'll be with you when the deal goes down" (Bob Dylan, *When the Deal Goes Down*, 2006).
[23] This is not mere speculation on the author's part; it was confirmed in conversations with key actors in the preparation of the Action Plan.
[24] *See*: https://enterprise.gov.ie/en/publications/irelands-action-plan-to-promote-collective-bargaining-2026-2030.html (accessed December 1 2025).

commitment to provide enhanced resourcing to the Labour Court to appoint "technical assessor" (i.e. experts in, for example, economics or logistics to assist the Court in adjudicating on disputes where detailed economic or commercial data are crucial) reflects a recommendation from the HLG Report. There is also a commitment to review both the *Code of Practice on the Duties and Responsibilities of Employee Representatives* (from 2000), and the *Code of Practice on Grievance and Disciplinary Procedures* (from 1990).[25] There are also actions in relation to the JLC system, and protections for trade union representatives, discussed in the next section.

In addition to the actions under the four themes, there are also commitments to fund *research* on collective bargaining, and "to ensure a consistent and robust flow of evidence-based research and data to inform policy decisions across the broader industrial relations landscape" (p. 13). This research will establish whether or not the key objective of the Plan and the AMWD, to increase collective bargaining coverage, has been achieved. This will form part of the mid-term review of the Plan (in 2028), and the assessment of outcomes at its conclusion in 2030. The government commits to "[c]ontinuous engagement and collaboration with the social partners" as being "central to the development and delivery of this roadmap" (p. 25).

5. Shelter from the storm?

The Action Plan will no doubt provoke divergent opinions and assessments. There are certainly obvious negatives. Many of the "actions" commit to reviewing or exploring options (rather than actually acting!). A particularly egregious example is in relation to the commitment under the fourth theme to "review and strengthen [Employment Regulation Order] mechanisms and enforcement". While the Plan references the HLG Report, it ignores the extensive procedure recommended by the social partners outlined therein to address employer non-engagement with these sectoral wage-setting mechanisms. Similarly, under the second theme, there is no mention at all of the proposal for a company-level "Good Faith Engagement" process as comprehensively outlined in the HLG Report. It appears that both these aspects of the HLG Report are now no longer considered viable.[26] In relation to JLCs, the HLG proposals are not considered to "necessarily contribute to the overall objective of promoting collective bargaining in order to make a positive contribution to the economy and society, driving and enabling competitiveness and productivity".[27] No further explanation is provided for this sweeping analysis. In relation to Good Faith Engagement, the government does not support "the use of penalties where employers do not engage [with trade unions]

[25] Again, all codes of practice in Ireland are legally non-binding, and represent soft law measures.
[26] Irish Government – Department of Enterprise, Tourism and Employment, *Public Consultation on Ireland's Action Plan to Promote Collective Bargaining Report*, 2025, available at: https://enterprise.gov.ie/en/publications/irelands-action-plan-to-promote-collective-bargaining-2026-2030.html (accessed December 1 2025).
[27] *Ibidem*, 11.

and can consider other deterrent or incentive mechanisms to encourage engagement";[28] no such alternative deterrent or incentive mechanisms, however, are suggested.

The Plan notes, on p 19, that "[n]o lacuna in law was identified in the work of the [HLG] in respect of protections for employees or employers". While this is not inaccurate, the HLG Report does not overtly, or positively, *state* that there is no such lacuna in law; the Plan seems to draw this inference from the absence of any such observation.[29] What the Plan does include, that certainly does not form part of the HLG Report, is a commitment to assess "the feasibility and impact of introducing mandatory mediation process between notification and industrial action"; this option "may need to be considered in consultation with WRC and ICTU and Ibec in terms of practicality" (p. 20). This measure had not been floated publicly at all during the years leading up to the preparation of the Plan, and is reported to have been introduced by the responsible Ministry (the Department of Enterprise, Tourism, and Employment); [30] its inclusion seems at odds with the decision to ignore some well-flagged, social partner-agreed measures, contained in the HLG Report.

The action item on public procurement is also worthy of comment; indeed it is worth quoting in full (emphasis added):

Conduct exploratory *research, including a Regulatory Impact* Assessment *and SME* test*, regarding the* potential *of the introduction of a pilot to include collectively bargained agreements as a weighting in a public procurement project.*

This is very heavily qualified language (explore/assessment/test/pilot/potential), and certainly does not amount to a robust commitment.[31]

However, the manner in which the Plan is drafted means that any assessment must also consider the potential positives. The action in relation to public procurement is a good example. While the language is somewhat non-committal, and even a little obtuse, the "success indictors" in relation to it are to identify "learnings" after a pilot is "concluded". Indeed, the ICTU has pointed to this as being one of the measures that has potential to be "most impactful".[32]

Similarly, in relation to JLCs, there is a commitment to, first, examine the role of JLCs in government-funded sectors (presumably a sector like publicly-funded home care-giving could be an example). While the process to promote JLCs, where employer representatives refuse to attend and engage, outlined in the HLG Report seems to have been discarded, there is a commitment to strengthen ERO (the sectoral order made by these Committees) mechanisms and enforcement. As with public procurement, one must consider the success

[28] *Ibidem*, 13. The Consultation Report suggests that the proposed (legally non-binding) Code of Best Practice on Collective Bargaining (as also recommended by the HLG) would be "more helpful" in achieving the overarching objective of improving collective bargaining coverage; such a Code is proposed in the Action Plan.
[29] Of course, one can draw an inference from something that is not addressed in relation to almost any matter…
[30] "The union ambition for the collective bargaining action plan" (*Industrial Relations News*, 41, 13.11.2025).
[31] 'When I use a word," Humpty Dumpty said, in rather a scornful tone, "it means just what I choose it to mean—neither more nor less" (Lewis Carroll, *Through the Looking-Glass*, 1871).
[32] "The union ambition for the collective bargaining action plan" (*Industrial Relations News*, 41, 13.11.2025).

indicators which include "an increase in the number of sectors covered" by such orders (p. 23).

While the Action Plan does not reference the "Good Faith Engagement" process outlined in the HLG Report, which sought to allow trade unions access to workplaces, where the employer does not engage in collective bargaining, the Plan explicitly refers to the Platform Work Directive,[33] which "represents a major step forward in tackling informal work in the Platform economy and aims to ensure that the employment status of individuals working through digital labour platforms is correctly classified and they enjoy appropriate rights and protections" (p. 17). This is linked with a commitment to engage with "ICTU and Ibec on *digital and physical* access subject to agreed criteria" (emphasis added) with a success indicator of reaching "[a]greement on digital and physical access…subject to agreed criteria" (p 18). Finally, despite the rather selective interpretation of the HLG Report (outlined above) in relation to employer and employee protections, there *are* commitments to review the operation of the Unfair Dismissals legislation as it relates to trade union membership and activity,[34] and to examine "legal protections or scope of legal protections for trade union representatives", with a success indicator of "[p]rotections identified *and progressed*" (emphasis added). It may well be that an *explicit* examination of this nature does indeed identify "lacunas" in the law.

6. Conclusions.

A first assessment of *Ireland's Action Plan to Promote Collective Bargaining 2026-2030* is that it aligns well with the assessment of National Action Plans under the AMWD as imposing an "obligation of effort" rather than an "obligation of results";[35] there is considerable effort, but rather less in terms of (immediate) results. While this may be initially somewhat disappointing to the trade union side in particular, it is important to re-emphasise the impact that the Directive has already had in some Member States, such as Ireland. As noted, the Irish Plan was published days before the CJEU judgment. The challenge to the Directive, and the Opinion of AG Emiliou issued in January 2025,[36] are noted in the Plan. However, the Plan is unequivocal (p. 8; emphasis added):

The Irish Government has committed to an Action Plan in the Programme for Government 2025, and subsequently reaffirmed its commitment to developing the action plan in close collaboration with the ICTU and Ibec, regardless of the outcome of the CJEU ruling.

[33] Directive 2024/2831 of the European Parliament and of the Council of 23 October 2024 on improving working conditions in platform work.
[34] And this review has commenced as part of the work of the new statutory Employment Law Review Group (of which the author is Chairperson; *see*: https://enterprise.gov.ie/en/publications/elrg-work-programme-2025-2026.html, accessed December 1 2025).
[35] De Spiegelaere S., Iriondo A., *Using the Minimum Wage Directive to strengthen collective bargaining: a trade union transposition guide*, 2025, available at: https://www.uni-europa.org/wp-content/uploads/sites/3/2025/01/Guidelines_MWD-1.pdf (accessed December 1 2025).
[36] Case C-19/23 (ECLI:EU:C:2025:11).

Therefore, the Directive has already had two direct impacts in Ireland; without it, it is unlikely the HLG would have been established in 2022, and without it, it is highly unlikely that there would have been a plan to promote collective bargaining in 2025. As Maccarrone has noted, EU interventions on national wage policy (irrespective of whether they are de-regulatory, like the austerity prescriptions after 2008, or re-regulatory, as in the AMWD) are always mediated via the strategic responses and power resources of the social partners, and by the policy stance adopted by the State.[37] Ireland was the 'poster child' for austerity, following the country's exit from a severe austerity programme, agreed with the Troika of the International Monetary Fund (IMF), the European Central Bank (ECB), and the European Commission (EC), and its return to economic growth.[38] Now, Ireland (with its weak collective bargaining laws, and relatively low coverage) could be an important testing ground for examining if the effort required by the Directive can be converted into results.

For Member States like Ireland (and others) where the State has traditionally been (at best) a passive observer in terms of collective bargaining, Article 4 of the Directive is clear; Member States *shall* promote collective bargaining. Now that Article 4 has been comprehensively endorsed by the CJEU, it is for the Commission to be proactive in monitoring compliance. The obligations in Article 10 of the AMWD on data collection and monitoring of, *inter alia*, the rate and development of collective bargaining coverage have always provided a transparency benefit, and potential "peer pressure" effect, as Member States gain greater awareness of their "performance" relative to that of other countries.[39] As noted above, domestically, some of the commitments in the Irish Plan might be somewhat vague, but concrete "success indicators" are often attached, which provide a clear benchmark for, not just *effort* but also, *results*. These will be closely monitored, not just by the Irish and European trade union movements, but by everyone with an interest in safeguarding and promoting the idea of "Social Europe".[40]

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[40] As Bob Dylan once sang: "the whole wide world is watching" (When the Ship Comes In).

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