

How to Enforce a Foreign Court Judgment in Ireland

October 2026



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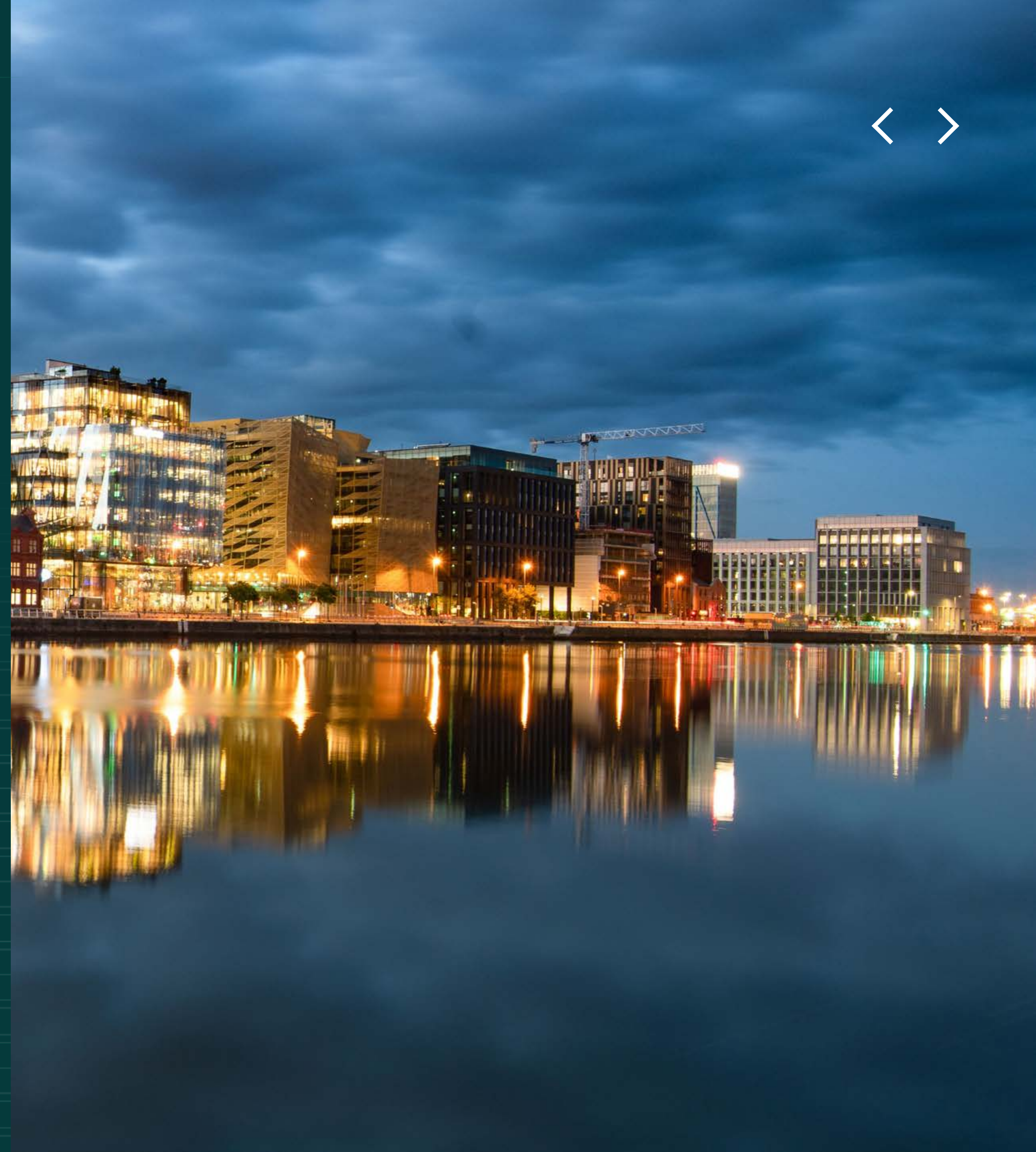
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Overview

Where a foreign court grants judgment against a defendant, it may be necessary for the successful party to have that judgment enforced in Ireland, for example, where the defendant is based here or has assets situated in this jurisdiction.

This briefing examines the options available to parties seeking to enforce foreign civil or commercial judgments in Ireland. The applicable enforcement regime will depend on a number of factors, including the jurisdiction in which the judgment was given and the date on which the underlying proceedings were commenced. Judgments in specialised areas, such as revenue and insolvency matters, are generally governed by separate rules and fall outside of the enforcement regimes the subject of this briefing.



Judgments granted by Courts in EU Member States

Council Regulation 44/2001 on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters ('Brussels I')

Brussels I was introduced into Irish law in 2002 to establish uniform rules governing jurisdiction in civil and commercial matters and to facilitate a more streamlined process for the recognition and enforcement of judgments between EU Member States.

Brussels I has been repealed and replaced by Regulation (EU) 1215/2012 ('**Brussels I Recast**') as of 10 January 2015, however, it still applies to applicable judgments granted by courts in EU Member States in proceedings instituted before that date. In order to enforce a judgment under Brussels I, it is necessary to obtain a declaration of enforceability in the EU Member State in which enforcement is sought. In Ireland, this involves an application to the Master of the High Court.

Regulation (EU) 1215/2012 of the European Parliament and of the Council on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters (recast) ('Brussels I Recast')

Brussels I Recast was implemented in Ireland by the European Union (Civil and Commercial Judgments) Regulations 2015 (S.I. 6/2015). It applies to in-scope judgments in civil and commercial matters given by the

courts of EU Member States in proceedings instituted on or after 10 January 2015.

Brussels I Recast has removed the need to produce a declaration of enforceability, as required by its predecessor, Brussels I. Instead, an applicable judgment handed down in an EU Member State will, subject to exceptions, be automatically recognised in other EU Member States without any court application being required. The Irish procedural requirements are set out in Order 42A Rules of the Superior Courts (**RSC**). Any party seeking to rely on Brussels I Recast will be required to produce:

- Copy judgment duly authenticated;
- Standard form certificate issued by the court which granted the judgment, certifying that the judgment is enforceable and where relevant, including information on the recoverable costs and the calculation of interest;
- Translations of the judgment and certificate, if required; and
- Affidavit of Service.

Brussels I Recast continues to apply to the enforcement of in-scope UK judgments in Ireland arising from legal proceedings instituted on or after 10 January 2015 and on or before 31 December 2020 (i.e. the end of the Brexit transition period).

Regulation (EC) No. 805/2004 (as amended by Regulation (EC) No 1869/2005 and Regulation (EC) No 1103/2008) ('European Enforcement Order')

The European Enforcement Order regime allows for a judgment in an uncontested claim delivered in one EU Member State to be enforced in another EU Member State (except Denmark). A judgment which has been certified as a European Enforcement Order in the Member State of origin shall be recognised and enforced in the other Member States without the need for a declaration of enforceability and without any possibility of opposing its recognition. The procedure for certification in Ireland is governed by Order 42B RSC.

The European Enforcement Order regime has continued application in respect of in-scope UK judgments given in legal proceedings which were initiated before the end of the Brexit transition period on 31 December 2020, as well as to court settlements which were concluded or approved before the end of the transition period, provided that the certification as a European Enforcement Order was also applied for before the end of the transition period.



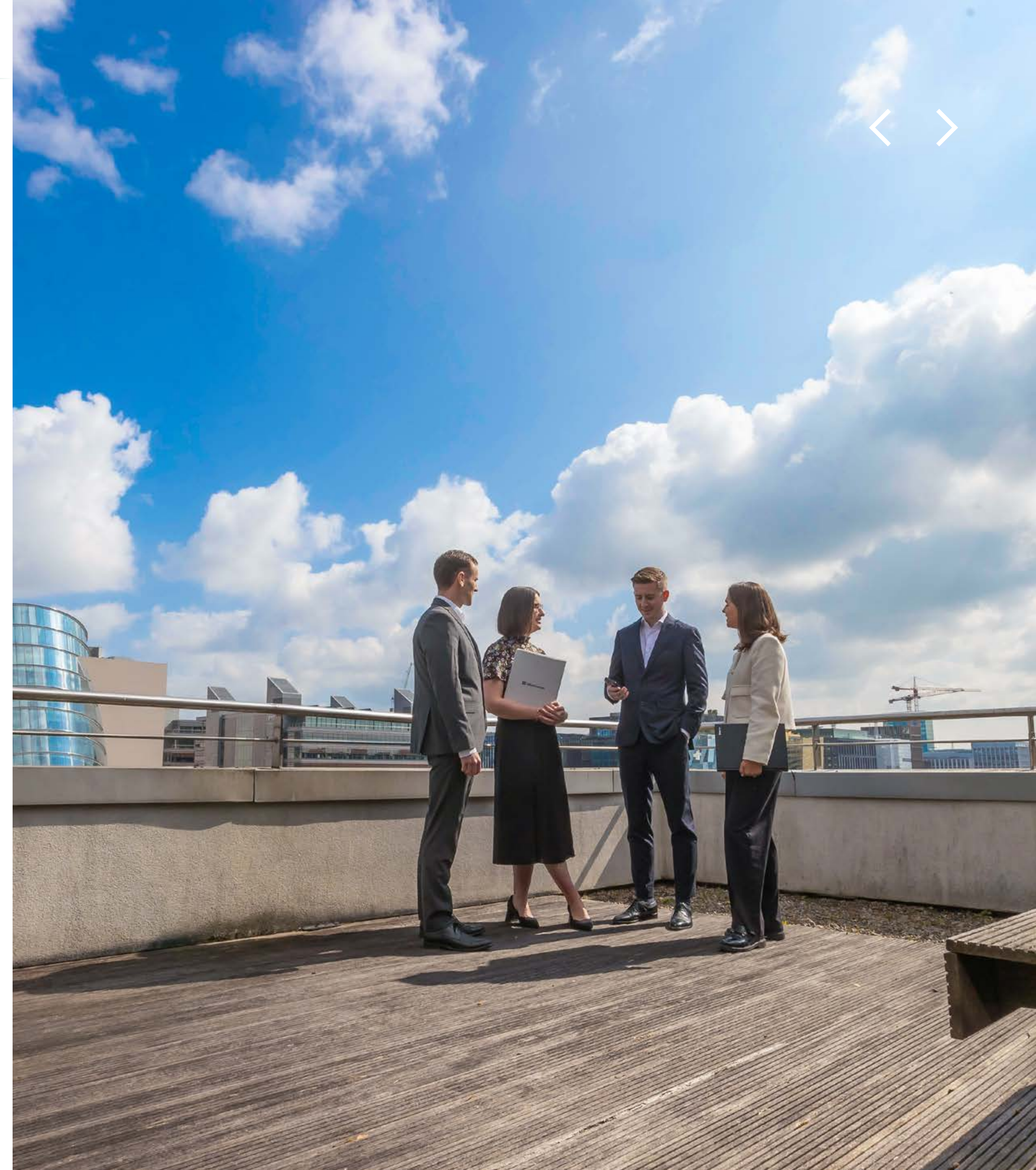
Judgments granted by Courts in certain European Free Trade Association ('**EFTA**') Member States

Convention on jurisdiction and the recognition and enforcement of judgments in civil and commercial matters signed on 30 October 2007 in Lugano ('Lugano Convention')

Like Brussels I and Brussels I Recast, the Lugano Convention is a framework which governs the recognition and enforcement of foreign judgments in participating States. The contracting parties to the Lugano Convention are the EU and three EFTA Member States, namely Iceland, Norway and Switzerland. A party based in an EU Member State seeking to enforce an in-scope judgment against a party in an EFTA Member State, or vice versa, may apply to the relevant court for a declaration of enforceability in respect of a foreign judgment to which the Lugano Convention applies.

Order 42A RSC sets out the procedural rules for such an application in Ireland, which is made by way of an ex-parte motion, grounded on an affidavit. Once a declaration of enforceability has been obtained, it will be deemed enforceable and have the same force and effect as a judgment of the Irish courts.

The UK ceased to be a signatory to the Lugano Convention after Brexit and so the Lugano Convention only continues to apply to proceedings instituted before the end of the Brexit transition period.



Judgments granted by Courts in Hague Convention Contracting States

Convention of 30 June 2005 on Choice of Court Agreements ('Hague Convention 2005')

The Hague Convention 2005 provides a framework for the recognition and enforcement of judgments given by the courts of contracting States where the underlying dispute is governed by an exclusive choice of court agreement. Although the Convention ceased to apply to the UK in its capacity as an EU Member State following Brexit, the UK acceded to the Convention as a contracting State in its own right with effect from 1 January 2021.

Given its broader membership¹, the Hague Convention 2005 can serve as a useful alternative avenue for enforcing an in-scope foreign judgment where neither the Brussels I Recast Regulation nor the Lugano Convention is available. However, a key element of the Hague Convention 2005 is that it applies only to disputes relating to civil or commercial matters that contain exclusive choice of court agreements. Where it does apply and judgment is given in the chosen contracting State, the judgment must be recognised and enforced in all other contracting States, except where one of the specified grounds for refusal applies.

An application for enforcement of a judgment in Ireland pursuant to the Hague Convention 2005 must be initiated in compliance with the procedure set out in Order 42D

RSC. An application must be supported by a sworn affidavit setting out *inter alia*:

- Sum of money payable under the judgment;
- Position with interest and damages;
- Grounds on which the application to enforce the judgment in Ireland is being made; and
- Confirmation that the judgment has not been previously satisfied.

The Convention of 2 July 2019 on the Recognition and Enforcement of Foreign Judgments in Civil or Commercial Matters ('Hague Convention 2019')

The Hague Convention 2019 came into force in Ireland on 1 September 2023 pursuant to the European Union (Hague Judgments Convention) Regulations 2023 (S.I. 434/2023). It has also come into force in the rest of the EU (excluding Denmark) and Ukraine.

The Hague Convention 2019 provides for the recognition and enforcement of a judgment from the courts of one contracting State in the courts of another contracting State, with no further review of the merits of that judgment. Exceptions to the recognition and enforcement are limited to specified grounds, such as public policy, due process, or

where it is inconsistent with a prior judgment.

The Hague Convention 2019 is much broader in scope than the Hague Convention 2005, in that it applies regardless of the type of jurisdiction agreement from which the judgment derives, and it applies to both in-scope monetary (e.g. damages, debt claims) and non-monetary (e.g. specific performance, declaratory relief) judgments. While the number of contracting States currently is limited, it has the potential to be an effective option for the recognition and enforcement of foreign court judgments in the future. One such example of its potential is in respect of the United States of America, which is a signatory to the Hague Convention 2019 but has not yet ratified it.

The Hague Convention 2019 entered into force in the UK on 1 July 2025. As noted, following Brexit, the Brussels I Recast and the Lugano Convention regimes ceased to apply to the enforcement of UK judgments arising from legal proceedings instituted after 31 December 2020. The Hague Convention 2019, therefore, provides an important framework for the enforcement of civil and commercial judgments between the UK and EU Member States. It does not, however, operate retrospectively and so only applies to judgments arising from proceedings commenced on or after 1 July 2025.

¹The Hague Convention 2005 entered into force on 1 October 2015 in all EU member states (except Denmark, where it entered force on 1 September 2018), and Mexico. It has also entered into force for Singapore (1 October 2016), Montenegro (1 August 2018), Denmark (1 September 2018), Ukraine (1 August 2023), the Republic of Moldova (1 July 2024), Albania (1 October 2024), Switzerland (1 January 2025), North Macedonia (1 March 2025) and Bahrain (1 July 2025).



Other Judgments

Enforcement of Judgments pursuant to Common Law

If a judgment granted by a foreign court does not come within the scope of a specific convention or regulation, the recognition and enforcement of such a judgment will be subject to common law enforcement principles. This includes many UK judgments arising from proceedings commenced after the end of the Brexit transition period on 31 December 2020, when the Brussels I Recast and Lugano Convention regimes ceased to apply, but before the Hague Convention 2019 entered into force in the United Kingdom on 1 July 2025 (an exception being those judgments which are within scope of the Hague Convention 2005).

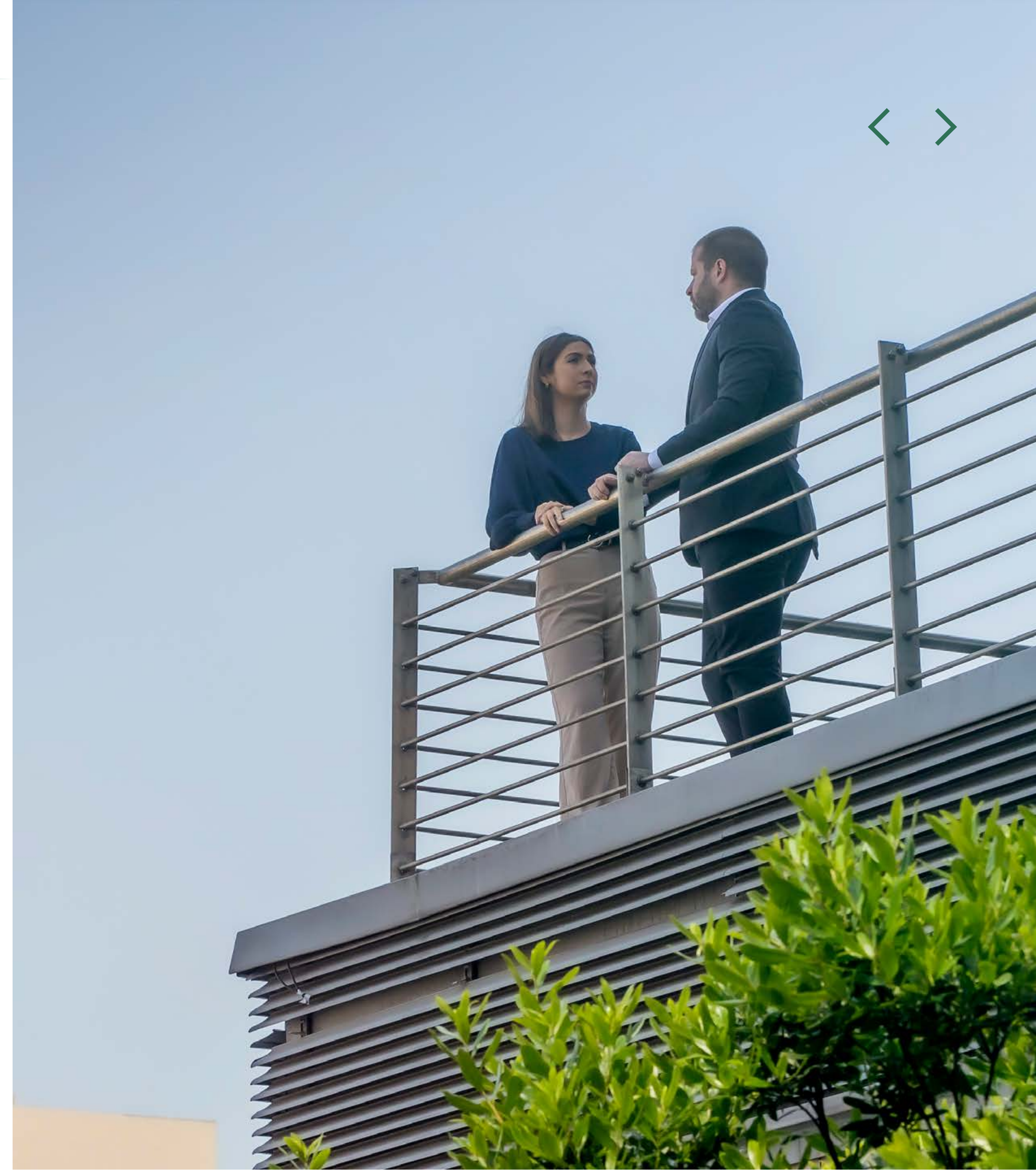
The common law rules do not allow for direct enforcement of foreign judgments. Instead, where there is a practical benefit to the judgment holder seeking to have the judgment enforced in Ireland, such a party can commence fresh legal proceedings, which effectively involve suing on the judgment as a debt.

In order to have a foreign judgment recognised and enforced under common law rules, certain criteria must be satisfied, including:

- the judgment must be for a definite liquidated sum;
- the judgment must be final and conclusive. If an appeal is

pending, a judgment may still be considered final and conclusive, unless the appeal has the effect of staying the judgment;

- the judgment has not been obtained by fraud;
- the foreign judgment is not inconsistent with a judgment of the Irish courts in the same matter;
- the judgment must be given by a court of competent jurisdiction; and
- enforcement of the judgment must not be contrary to public policy or the underlying foreign proceedings contrary to natural justice.





Frequently Asked Questions

Can a foreign court judgment in a civil or commercial matter be enforced in Ireland?

Yes. Many foreign judgments obtained in civil and commercial matters can be enforced in Ireland, but the process depends on where the judgment was obtained and when the underlying proceedings were initiated. Different rules apply to judgments from EU Member States, certain EFTA states, Hague Convention contracting states, and countries where no applicable treaty framework exists.

Are EU judgments automatically enforceable in Ireland?

In-scope civil and commercial judgments from EU Member States can be recognised and enforced in Ireland under the Brussels I Recast regime without the need for a declaration of enforceability. Certain documentation, including a certified copy of the judgment and the relevant certificate, is required.

How has Brexit affected the enforcement of UK judgments in Ireland?

The enforcement route depends on when the proceedings were commenced. Different frameworks may apply, including Brussels I Recast, Hague Convention 2005, Hague Convention 2019, or Irish common law. Determining the correct regime is often the first step in assessing enforcement options.

What is the Hague Convention 2019 and why is it important?

The Hague Convention 2019 provides a framework for the recognition and enforcement of in-scope civil and commercial judgments between contracting States. It is broader in-scope than the Hague Convention 2005 because it is not limited to judgments arising from exclusive jurisdiction agreements and it can apply to certain non-monetary, as well as monetary, judgments. It has become particularly important for the enforcement of certain UK judgments following Brexit.

What happens if no convention or regulation applies?

Where no applicable convention or regulation exists, a judgment creditor may still seek to enforce the judgment under Irish common law. This generally requires the commencement of new proceedings in Ireland based on the foreign judgment debt and satisfaction of a number of legal criteria before enforcement will be granted.



Summary

Judgment Type	Enforcement Route	Key Requirements
EU Member State judgments (proceedings commenced before 10 Jan 2015). Judgment in contracting States where underlying dispute governed by an exclusive choice of court agreement	Brussels I (Regulation 44/2001)	Application to the Master of the High Court for a declaration of enforceability
EU Member State judgments (proceedings commenced on or after 10 Jan 2015)	Brussels I Recast (Regulation 1215/2012)	Automatic recognition and enforcement without declaration of enforceability. Procedural requirements pursuant to Order 42A RSC
EU Member State judgments in uncontested claims	European Enforcement Order (Regulation 805/2004)	Certification as a European Enforcement Order in the Member State of origin. Enforcement in Ireland pursuant to Order 42B RSC
EFTA Member State judgments (Iceland, Norway, Switzerland)	Lugano Convention	Application to the Master of the High Court for a declaration of enforceability under Order 42A RSC
Judgment where underlying dispute governed by an exclusive choice of court agreement involving contracting States	Hague Convention 2005	Application to the Master of the High Court under Order 42D RSC
Hague Convention 2019 contracting States judgments	Hague Convention 2019	Application to the Master of the High Court pursuant to S.I. No. 434/2023
Foreign judgments that do not fall within an enforcement regime	Common Law Procedures	New proceedings commenced in Ireland, suing on the judgment as a debt
UK judgments	Route depends on timing and scope: Brussels I Recast and Lugano Convention for in-scope proceedings commenced before the end of the Brexit transition period; Hague Convention 2005 where an exclusive choice of court agreement applies; Hague Convention 2019 for in-scope proceedings commenced on or after 1 July 2025; otherwise common law procedures	Identify the date proceedings were commenced and whether a regime applies. If no applicable convention or regulation applies, fresh proceedings must be commenced in Ireland

Further Reading

24 Mar 2026

Ireland’s Pro-Enforcement Approach to Foreign Arbitral Awards

BRIEFING | LITIGATION AND DISPUTE RESOLUTION

19 Aug 2026

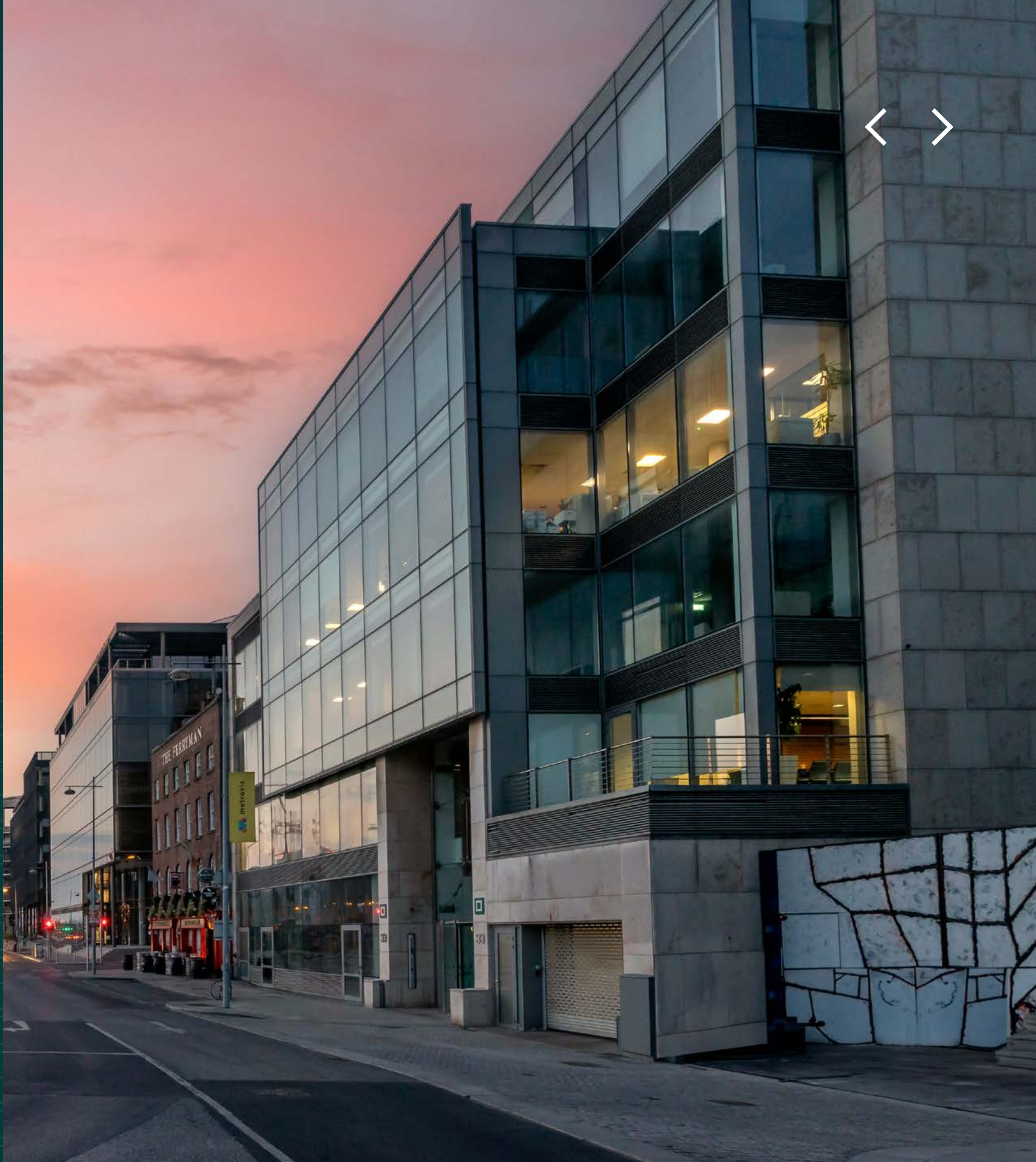
Forum Non Conveniens: Jurisdictional Challenges Before the Irish Courts

BRIEFING | LITIGATION AND DISPUTE RESOLUTION

23 Apr 2026

Enforcement of Judgments: Clarification from the High Court on NI Judgment Recognition

BRIEFING | LITIGATION AND DISPUTE RESOLUTION



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