

15 January 2024

RE: Review of National Ports Policy

To whom it concerns,

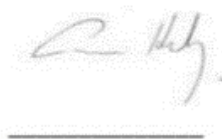
Cork Chamber represents 1,200 members together employing 100,000 people throughout the city, metropolitan area and county. Our vision is to be a world-leading Chamber of Commerce, delivering on a progressive economic, social and sustainability agenda at the heart of a vibrant business community. Our direction is guided by our formal pledge to uphold the United Nations Sustainable Development Goals (SDGs), five of which have been identified by the Chambers Ireland network.

It is very positive that a review of the National Ports Policy is underway as the needs of Irish Ports are changing. It is essential that our ports are properly equipped to manage ongoing and future challenges and our island nation is positioned to fully exploit its geographical advantages. We are heavily reliant on our ports for economic prosperity with approximately 90% of all of Ireland's imported and exported tonnage handled by our ports. In addition to the connectivity ports create with global markets, they will also be key to the progression of offshore renewable energy which will be transformative for Ireland from both an economic and energy security perspective. As the second largest natural harbours in the world, the Port of Cork has the potential to be a global leader the way in renewable energy.

The Port of Cork is also uniquely positioned as Ireland's only dedicated cruise berth which is of huge benefit to the local economy here in Cork as well as the profile of the entire country. This sector will require government investment support for infrastructure, including the provision of onshore supply power which is mandatory by 2030.

Cork Chamber welcomes the opportunity to contribute to the development of the National Ports Policy update and we ask that the below observations are duly considered. We also remain at your disposal to share any additional insights from our member businesses.

Yours Sincerely,



Conor Healy
CEO

PORTS FUNDING

Irish Ports are facing a significant funding gap. Jack Chambers TD, Minister of State at the Department of Transport, recently indicated that the current mechanism, as outlined under the National Ports Policy, whereby our state commercial ports operate as independent commercial bodies without direct exchequer funding has proven effective in the establishment of responsive and highly competitive ports¹.

However, there are concerns that the corporatisation policy which was adopted in 1997 has become outdated. According to a recent analysis of port funding by EY, “The world in which ports operate today is very different. Not only are they required to fund the maintenance and replenishment of a capital-intensive operation, but they are also required to make significant investment to handle increased throughput and remain an efficient link in the supply chain”².

While the Minister has recognised the need to maximise financing opportunities for ports, it is evident that a more concrete financial commitment from the State will be necessary, particularly for key strategic port investments. Without State support it will be difficult to fulfil one of the main objectives of the National Development Plan, which is to support international connectivity, of which our ports are the cornerstone.

A recent report commissioned by Wind Energy Ireland³ underscores the immediate need for Government funding for Irish ports as it will be crucial to facilitate the fruition of offshore wind energy projects to enable Ireland reaching its ambitious 2030 targets.

Among the recommendations based in this report include funding sources such as:

- **Public Sector Debt** (direct and indirect) where loans to support the development of projects could be facilitated through the Irish Government.
- **Public Sector Equity** where for instance ISIF could act as a commercial investor serving to generate investment returns and facilitate projects and initiatives that have a positive economic impact in Ireland.
- **Public Sector Grants** where port infrastructure projects could be part financed by direct Exchequer funding, particularly where projects exhibit a funding gap.

It is crucial that this review considers the need for state support, especially for key strategic port investments. Although the existing National Ports Policy has successfully facilitated the establishment of competitive, agile, and responsive ports, the present funding challenges confronting these ports threaten to undermine the positive outcomes achieved thus far.

¹ [Oireachtas: Ports Policy Debate 2023](#).

² [EY: Why funding solutions must be today's port of call](#)

³ [Wind Energy Ireland: We can build them](#)

DEVELOPMENT OF OFFSHORE RENEWABLE ENERGY AND PORT INVESTMENT

Cork Harbour, including Bantry Bay, are nationally important for delivering on our climate and energy targets. The energy, port, grid access, education, and research infrastructure are already in place in Cork. Cork Harbour's strategic location as a gateway to the EU and Ireland's enormous maritime jurisdiction, and the complementary scale and location of Bantry Bay with its deep water combine to make Cork a designated national renewable energy hub and a central plank towards delivering Ireland's and the EU's climate action targets. Cork has the greatest export potential due to its proximity to the EU market and the likelihood of increased interconnection locally including that for an EU 'Supergrid'.

Port investment is crucial to delivering on our renewable energy targets and to reaping the benefits and accompanying job creation from the development of our abundant offshore wind resources. A prime example of this can be found in the Humber region in the UK where extensive economic, social, and environmental benefits have resulted from offshore wind projects⁴.

Significant investment is needed now in our major ports to deliver on both our offshore renewables targets and to facilitate job creation. A failure to move quickly to upgrade our ports for this capacity could see us lose out to ports in neighbouring countries on the major private investment and job creation that will be generated by offshore renewables. Government needs to move quickly to ensure investment in our major ports to deliver both on our climate targets and benefit from the economic growth associated with renewables development. The consequences of delays have already been experienced in recent years with the loss of key players from the Irish Windfarm market⁵. Regarding ports' role in renewable energy including wind and hydrogen the Issues paper⁶ states: "Ports must have the necessary infrastructure to allow them to grasp this opportunity." State investment is vital to fulfil this need.

The review of the National Ports Policy is a great opportunity to pave the way for ports to fully realise the true potential of the Offshore Renewable Energy. A 2022 National Port Study commissioned by Wind Energy Ireland⁷ highlights the imperative for additional port infrastructure to accommodate the growing Irish offshore wind sector. It also outlines the funding challenges that exist to establish and enhance facilities for the successful deployment of both fixed and floating wind technologies which will be crucial in meeting our climate targets. It warns that ports may need to divert from existing business streams to embrace the offshore renewable energy industry, and the lack of assured future offshore renewable energy revenue further complicates financing. Despite the funding challenges the report outlines the need for large-scale port projects to commence promptly in order to be operational during the initial project construction stages associated with Ireland's offshore wind energy auctions that are set to come on stream in the very near future.

⁴ [Ørsted's impact in the Humber region](#)

⁵ [Shell's exit from Irish windfarm market linked to delay in setting up State agency](#)

⁶ [Review of National Ports Policy 2013 - Issues Paper](#)

⁷ [Wind Energy Ireland: National Ports Study 2022](#)

It is essential that the Port of Cork and other ports are supported to build facilities to offshore renewable energy specifications as they can diversify their use across sectors, which according to this report will potentially attract investment. Within this report examples from the UK and Scotland, where government-backed support stimulated job creation and infrastructure development, serve as models.

The recent National Ports Study also outlined that Belfast Harbour is currently the only port on the island of Ireland, that has capability, capacity and infrastructure to accommodate the staging and marshalling of offshore wind projects. Given the transformative potential that the offshore renewable energy sector holds for the entire region this must be addressed in this review. This review is a prime opportunity to acknowledge the imperative of promptly securing funding for the timely implementation of port infrastructure projects targeting the offshore renewable energy sector, particularly here in Cork. According to the Port of Cork's Master plan 2050 it can become a key enabler of the green energy sector in Ireland, "by taking advantage of its deep-water channels and berths; building out new infrastructure with approved planning permission in place; reclaiming land to accommodate large project cargoes for offshore wind marshalling and assembly activities; upgrading infrastructure; use of port lands and/ or near shore storage and providing access to berth and quays for operation & maintenance (O&M) activities"⁸.

PORT CAPACITY

The Irish Ports Capacity Study⁹ conducted in 2023 outlined the opportunities to make use of the surplus RoRo capacity in both Rosslare Europort and the Port of Cork. However, it concluded that these ports will require better hinterland connectivity and a range of investments in port facilities to take advantage of this.

It is crucial that ports like the Port of Cork are enabled to increase capacity and accommodate expansion as demand dictates. The Port of Cork has already indicated that the new €86 million container terminal in Ringaskiddy will need to be expanded to meet the increased demand for goods and services due to population growth. The M28 motorway to Ringaskiddy must be delivered at pace to allow for these expansion plans and to facilitate the departure of the port from the Tivoli dock. Road access to Marino Point must also be progressed. The R624, including the provision of an enhanced bridge crossing at Belvelly, must be progressed at pace to allow the Port of Cork to fulfil its ambitions set out in its 2050 Master Plan.

In addition to road considerations, rail must also be taken into account. For instance, rail access at Marino Point could enhance operations within the Port of Cork, "An additional station adjacent to Marino Point may facilitate rail freight options complementing the European Rail Traffic Management System (ERTMS)²; a horizontal priority to the TransEuropean Transport Network (TEN-T)"¹⁰.

⁸ [Port of Cork Masterplan 2050 Executive Summary](#)

⁹ [Irish Maritime Development Office: Irish Ports Capacity Study](#)

¹⁰ [Port of Cork Masterplan 2050 Executive Summary](#)

The Irish Ports Capacity Study makes reference to the plans to significantly increase LoLo capacity in the Port of Cork over the next five to seven years. This review of the National Ports Policy must therefore make provision for a comprehensive framework and strategic direction for the development and expansion of the Port of Cork and others mentioned in the Irish Ports Capacity Study who are facing similar stumbling blocks in relation to future capacity constraints.

Another area of concern is planning. New infrastructure in the lower harbour will be required by the Port of Cork to meet its plans for expansion under its current Master Plan¹¹. However, securing planning permission and the necessary consents for future infrastructure has been identified as an area of constraint for the Port.

The prioritisation of policies and allocation of resources in maritime, planning, and legal state agencies is crucial. Planning processes for all related projects should be recognised as being in the overarching public interest, serving as a vital facilitator for the implementation of renewable initiatives. Consequently, it is imperative to ensure effective resourcing for state agencies like MARA, An Bord Pleanála, and the relevant Irish Courts, aiming to streamline consenting procedures. Additionally, port application projects should be prioritised given their critical importance to the development of Offshore Renewable Energy projects.

The availability of land must also be a consideration of this review. Without the necessary land, developing the necessary infrastructure for the progression of offshore wind will be another stumbling block that ports face. When faced with limitations or when land is owned by other state entities, it is important to evaluate the significance of these lands and utilise them in a manner consistent with the guidelines mandated by the LDA. It is also important that the ports sector can capitalise on the availability of suitably zoned sites. The recent Department of Housing, Local Government and Heritage Circular PL 11-2023 Design Flexibility Provision should be used in consideration of port infrastructure.

This review of the National Ports Policy therefore must ensure that policies at the national level align with the specific needs and goals of the Port of Cork and other ports across the country. This alignment is crucial for creating an enabling environment for port expansion, infrastructure development, and meeting the increasing demand for goods and services.

Funding is cited by all ports as the biggest impediment to capacity increases in the Irish Ports Capacity Study. The review should address funding mechanisms and allocate resources strategically to support port expansion projects. All avenues should be explored, including public-private partnerships, government funding, etc., to accelerate the development of critical infrastructure like the container terminal in Ringaskiddy.

CLIMATE CHANGE AND ENVIRONMENTAL CONSIDERATIONS

¹¹ [Port of Cork Masterplan 2050 Executive Summary](#)

The Port of Cork's Master Plan 2050¹² lays out ambitious plans to become a net-zero port by 2050. It makes provision for environmental management, decarbonisation, offshore renewable energy and the consideration of future cargoes. Due to its natural geostrategic advantages the Port of Cork should be supported by this review in positioning itself as an energy hub as it can play a key role in the energy sector in Ireland "by ensuring support to its existing customers while facilitating the future energy security of the country through transition fuels, Offshore Renewable Energy (ORE) sector and a variety of green energy cargoes."

The concept of 'Coastal Shipping' is provided for in Port of Cork's Master Plan 2050. 'Motorways of the Sea' can support the Ten-T networks in Europe which has potential to be more environmentally friendly, "It proposes the development of new intermodal maritime based logistics chains in Europe and identifies a lack of connection between sea, inland waterways, and rail. Future growth of this transport mode could be inexpensive, less damaging to the environment, and reduce road congestion."¹³

This review should incorporate sustainable practices and environmental considerations into the policy framework. This will be crucial if potential environmental concerns associated with port expansion are to be addressed.

In relation to the circular economy, it is important to consider the future decommissioning of wind turbines as ports may play a key role in facilitating this. This review is an opportunity to forward plan for this and integrate circular economy principles which will be crucial to maximise environmental and economic benefits.

UPSKILLING AND DIVERSIFYING THE MARITIME LABOUR FORCE

Cork is home to some of the world's best training facilities when it comes to maritime studies. For instance, The National Maritime College of Ireland (NMCI), based in Ringaskiddy provides education and training services of the highest quality and includes degree programmes in Nautical Science, Marine Engineering, Marine Electrotechnology, and Supply Chain & Logistics.

As the offshore renewables sector looks set to flourish in Ireland, the associated projects will require a skilled workforce to satisfy the jobs that will be created. The NMCI is already anticipating this demand and has begun working with industry to develop particular courses that might be required¹⁴. With ambitious plans to cater for the offshore renewable energy sector, such as developing training programmes to produce pilots who operate the remotely controlled submarines that monitor the web of cables beneath turbines (Ireland does not currently have this training), it is vital the necessary supports are in place to accommodate this growth.

¹² [Port of Cork Masterplan 2050 Executive Summary](#)

¹³ [Port of Cork Masterplan 2050 Executive Summary](#)

¹⁴ [Maritime College head: Ireland must seize opportunities presented by major off-shore projects](#)

This review of the National Ports Policy can play a crucial role in developing a skilled workforce for the port industry by identifying skill requirements, collaborating with educational institutions such as the NMCI, encouraging the implementation of apprenticeships and internships and incentivising skills development. It is important that consultation with educational institutions in this field takes place as part of this review process.

INSIGHT FROM OUR MEMBERS

In preparation of this consultation process, we received feedback and insight from our members which both shaped and guided this submission. While we have incorporated elements of all this feedback into this submission, it is important to specifically include the observations provided to us by The Port of Cork:

Port Capacity Funding - Securing Government funding to support future infrastructure developments to meet projected trade growth demand and to facilitate the ORE & Green Energy sector requirements.

The IMDO Irish Ports Capacity Study page 8 states that 'Funding is cited as the biggest impediment to capacity increases'. Significant investment in port infrastructure is required to meet the Government's Climate Action Targets. Such Port infrastructure will not only crucially facilitate Ireland meeting its climate action targets around ORE but it will also contribute to the significant opportunities outlined in the Government's Industrialisation plan around this sector. New ORE revenue streams will also significantly contribute to the regional economy and local employment. Urgent change is required to current National Ports Policy as Government funding is required to build out infrastructure to support the ORE sector in line with State Aid exemptions under Art.45 (EU) No.1315/2013. Irish ports are, due to its commercial semi-state status/lack of State Aid exemptions, placed at a disadvantage compared to other EU member states and other national non-commercial ports in competing to provide port infrastructure to support ORE in Irish waters. In short, a more flexible approach is required in terms of how the port sector is funded. The following will need funding support from Government:

- Port infrastructure to support Irish ORE industry - (quayside, laydown area and storage areas) for marshalling and assembly of components. This will also lead to significant opportunities as per the Government's Industrialisation plan around this sector. Nine Heads of State & Government and the President of the EU Commission met in Ostend to agree new commitments on the build-out of offshore wind in the North Seas. Ireland is one of the nine member states that signed up to this declaration. In an Industry Declaration more than 100 companies, representing the whole value chain of offshore wind and renewable hydrogen in Europe, outline what the nine Governments need to do now to deliver their offshore wind ambitions. Port of Cork is one of those companies.
- OPS and LNG Bunkering at Ports. By 2030 Ten-T ports will be obliged to provide shoreside electricity for visiting vessels and bunkering facilities for alternative fuel provision, also if market demands, by 2025 there must be refuelling points for liquefied methane at ports of the Ten-T core network.

- Port infrastructure to facilitate transition fuels such as LNG FRSU terminal, as required by the Government's recent Energy security of supply document.

Statutory Consents - Securing statutory consents such as planning, foreshore & dredging in a timely manner to allow ports develop infrastructure in a timely fashion.

- ABP to turn around planning permission decisions within statutory timelines of 18 weeks to allow ports develop infrastructure in a timely fashion. Currently PoCC are awaiting 22 months with an inspector report yet to be sent to ABP Board for a decision.
- Turnaround timelines on decisions to grant foreshore leases / licences / MAC urgently needs to improve.
- EPA turnaround timelines on decisions to grant dredging permits urgently needs to improve
- Turnaround timeline to be accelerated on new MARA provision whereby ports with planning permission already in place can apply for a MAC.
- A new Planning Bill to be introduced without delay which facilitates extensions to planning deadlines on SID projects that were subject to EIA.
- Government to introduce fast track planning provision whereby Ports can reclaim land with use of maintenance dredge material otherwise being dumped at sea – circular economy.
- Ports/DOT should be reinstated as statutory consultees for the purposes of third parties seeking planning permission in the proximity of ports.
- The rapid expansion of SAC's (special areas of conservation and protection) in traditional port areas can create a difficult arena for port expansion and planning approvals (ports being state owned and national strategic assets). Better coordination between government departments around future planning to ensure interests of Ireland's Economy and Environment are both best served.

Additional Lands - Securing additional lands to support Port expansion plans

As we move from city centre locations, there will be a requirement for more port land with appropriate zoning. Lack of land will be an impediment and we need robust zoning policies in place to facilitate acquiring land and reclaiming lands essential for port growth. This will unlock significant tracks of land out of the city centres towards facilitating redevelopment of brownfield sites for compact living with active travel and public transport in very close proximity, e.g. Tivoli is already connected by rail, national road and sea.

Improved Hinterland Connectivity

Government to ensure Irish ports designated as EU Core TEN-T Network ports have adequate hinterland connectivity, such as the M28 to Ringaskiddy and R624 to Belvelly Cobh. Port of Cork is on two EU designated core transport corridors (Atlantic and North Sea Mediterranean) and required by EU to be connected by strategic road. Port of Cork is also designated as a Tier1 Port of National strategic Importance under the current National Ports Policy. All roads

connecting Tier 1 ports to the National Road Network should be classified accordingly. Improved connectivity to Port of Cork such as the delivery of the M28 to Ringaskiddy and R624 link road to Marino Point will unlock significant port capacity in Cork lower harbour to accommodate the ever-increasing ship vessels sizes and to move closer to EU and international ship navigation channels.

Other Policy/Interventions:

- Ports to prepare Port specific climate action roadmaps to meet Governments Climate Action Plan targets.
- Port Of Cork's unique position as Ireland's only dedicated cruise berth. This represents a significant contribution to local economies, job creation, and revenue generation. This sector will also need government investment support for infrastructure and provision of shore power provision (OPS is mandatory by 2030). The Port will continue to collaborate closely with all cruise industry stakeholders including environmental bodies, cruise lines, tourism boards, and local businesses, to develop sustainable and mutually beneficial partnerships to promote responsible cruise tourism practices.